

# LONDON BOROUGH OF BRENT

**Executive - 12 April 2005**

## **Report from the Director of Environment**

For action

Wards affected: Kilburn/Queens Park

**Report Title: South Kilburn Supplementary Planning Document**

Forward Plan Ref: ES-04/05 307

### **1.0 Summary**

- 1.1 This report seeks approval of the South Kilburn Supplementary Planning Document (SPD) which has been prepared by the Planning Service in conjunction with the South Kilburn New Deals for Communities Board (SKNDC) local residents, community groups and members of the Kilburn Kensal Area Consultative Forum.
- 1.2 It is based on the policies of the Unitary Development Plan 2004 and the adopted Masterplan for the Regeneration of South Kilburn (approved by Executive on the 12<sup>th</sup> July 2004) and reflects the objectives of the South Kilburn New Deal for Communities programme and issues raised through extensive public consultation.
- 1.3 The South Kilburn SPD provides guidance to developers on the form of the development that the Council as both Planning and Highway Authority, considers acceptable. The SPD also establishes the planning justification for any legal agreements associated with future planning applications for the area. It is proposed that this is adopted as a Supplementary Planning Document.
- 1.4 The Planning Committee at its meeting on 16<sup>th</sup> March 2005, recommended to the Executive that the proposed Council responses to representations and that the proposed changes to the draft SPD be noted. It was also recommended that the adoption of the revised SPD be supported. A concern expressed at committee was that too few changes were proposed as a result of the representations made on the Consultation Draft SPD. Therefore the appendices attached have been amended to rectify this.

## **2.0 Recommendations**

That the Executive:

- 2.1 Agree the officer responses to the representations as set out in the Summary of Responses on the South Kilburn SPD (as set out in Appendix 1)
- 2.2 Agree the proposed amendments to the draft SPD; and
- 2.3 Resolve to adopt the revised South Kilburn SPD as a supplementary planning document to the Unitary Development Plan.
- 2.4 That the proposed amendments to the Sustainability Appraisal (as set out in Appendix 3) be agreed and Sustainability Appraisal be approved.

## **3.0 Detail**

- 3.1 In February 2005 a draft SPD for South Kilburn was prepared in conjunction with the South Kilburn New Deal for Communities.
- 3.2 The objective of the SPD is to ensure the long term physical and environmental regeneration of South Kilburn. The SPD seeks to ensure a mix of housing size and tenure (affordable and private housing) all built to high quality environmentally sustainable standards, improved community, leisure health and education facilities, public open space and street improvements. In addition, the SPD will assist in meeting the South Kilburn New Deal for Communities' objective to create a place where people are proud to live, learn and work.
- 3.3 It has been developed in line with the requirements of the Planning and Compulsory Purchase Act 2004 and associated regulations and is such a formal planning document and therefore carries more weight than the Masterplan as a material planning consideration when determining planning applications. The SPD also sets out the Council's requirements and aspirations for redevelopment of the privately owned sites as these were not covered by the Masterplan which concentrated on the development of Council owned land.

- **Consultation Process**

- 3.4 The Council formed an SKNDC Core Group consisting of Council and NDC officers and South Kilburn residents who developed the consultation strategy for both the pre production and formal consultation stages of the SPD. The approach taken illustrates the continuing involvement of the community in shaping the future of South Kilburn. The Council prepared a Consultation Statement to accompany the consultation draft SPD. The Consultation Statement set out the individuals and groups to be consulted on the draft SPD and the methods utilised.
- 3.5 Extensive public consultation, in accordance with that set out in the Consultation Statement, was undertaken with the local community as agreed by the Planning Committee on the 26<sup>th</sup> January 2005. Consultation was undertaken from 7<sup>th</sup> February until 7 March and

included letters/leaflets to 5,000 households and community groups within South Kilburn and Queens Park. Publicity materials (posters and leaflets) were widely distributed on commencement of public consultation, 3 public meetings were held and Council officers attended a number of residents group meetings as well as presenting an item to the Kilburn Kensal Area Consultative Forum.

- 3.6 Unfortunately due to an oversight the draft SPD was not advertised by press notice informing of the consultation, as required by the relevant regulations. This was rectified by placing the relevant notice in the press and allowing a further period for representations, closing Monday 4<sup>th</sup> April 2005. At the time of revising this report on 31<sup>st</sup> March the extended public consultation period was still open for four days. The appendices to this report include the further comments received to date during this extended period. Two additional comments (1 individual and 1 specific consultee) have been received since the Planning Committee meeting on 16<sup>th</sup> March 2005 and three additional officer amendments are proposed. It is not expected that many further substantial comments will be received in the final four days of the extended public consultation period. A supplementary report will be prepared for the Executive summarising additional comments received within these four days.

- **Methods of Consultation**

- 3.7 The main methods of consultation which generated responses were:
- Consultation Leaflets and Letters
  - Meetings
  - Information on Brent Council and SKNDC Web sites
- 3.8 At the time of revising this report on 31 March, 12 responses on the SPD have been returned from the consultation leaflets.
- 3.9 Letters have been received from 6 consultees, 5 of which made comments on the draft SPD. A detailed response from one Councillor has been received addressing issues of both principle and detail of wording. 12 responses have also been received on line from Brent's website or from emails.
- 3.10 Public meetings/exhibition were held on Tuesday 15<sup>th</sup> February (Albert Road Day Centre, South Kilburn), Thursday 17<sup>th</sup> February (St Anne's and St Andrew's Church, Queens Park) and Friday 18<sup>th</sup> February (Marian Centre, South Kilburn). 10 people attended the public meeting on 15<sup>th</sup> February, 11 on 17<sup>th</sup> February and approximately 6 attended the exhibition 18<sup>th</sup> February. Following the public meetings 1 response was received from the consultation leaflet.
- 3.11 All responses received were acknowledged upon receipt.

- **Recommended Revisions**

- 3.12 The planning committee at its meeting of 16<sup>th</sup> March noted and approved the consultation responses and proposed amendments to the draft SPD received up to 11<sup>th</sup> March. Prior to the Committee meeting,

these were discussed and agreed by the SKNDC Board at their meeting of 14<sup>th</sup> March.

- 3.13 As set out in paragraph 3.6 two additional comments were received following the planning committee considered the responses at the meeting on 16<sup>th</sup> March. These did not generate any further amendments proposed to the SPD.
- 3.14 A summary of the responses received to date and the proposed Council responses are attached at Appendix 1.
- 3.15 At the time of writing, the majority of the issues raised by individuals are already covered by the draft SPD or do not generate amendments to the SPD.
- 3.16 The comments received from specific stakeholders have generated proposed revisions to the SPD for accuracy and detail. The main revisions required have been generated from comments by English Heritage to ensure that the protection of the historic environment is fully incorporated into the SPD. All the stakeholder comments and proposed revisions to the SPD are set out in the additional summary of responses (see Appendix 1).
- 3.17 Various officer amendments are also proposed to the SPD to correct inaccuracies and clarify details. These officer amendments mainly relate to Section 4 (Neighbourhood Design Principles) of the SPD. A summary of officer amendments to the South Kilburn SPD is included at Appendix 2. Three additional officer responses are proposed from the Planning Committee meeting to correct inaccuracies and clarify details as set out in Appendix 2.

- **Next Steps**

- 3.18 Following adoption of the SPD the Council is required to prepare an adoption statement setting out the date the SPD was adopted and where copies of the SPD and Summary of Responses can be viewed. The adoption statement will also specify that anyone aggrieved by the SPD can apply for a judicial review of the decision to adopt the SPD. The Summary of Responses on the South Kilburn SPD will set out how the Council has complied with the Consultation Statement, set out the number of representations received from each method of consultation and include a summary of issues raised from public consultation, the Council response and whether any amendments are required to the SPD as a result.
- 3.19 The Summary of Responses and Adoption Statement will be published on the Council's website and sent to all that requested to be notified of the SPD.
- 3.20 The SPD will be published by the end of April/early May 2005.

## **4.0 Financial Implications**

- 4.1 The SPD is designed to form ultimately the framework for determining applications for the South Kilburn area. The assessment of the planning applications will be undertaken in the normal way with costs contained within existing budgets.
- 4.2 There are, however, wider implications arising from any possible development. The associated legal agreements will secure funding and benefits which will mitigate the impact of the development and contribute to the regeneration of South Kilburn.

## **5.0 Legal Implications**

- 5.1 The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. Unitary Development Plans and Supplementary Planning Guidance (SPG) will be replaced by a Local Development Framework. Since there are no provisions under the Act to produce SPG's the Council must now produce SPD.
- 5.2 Supplementary Planning Documents are not subject to independent examination and will not form part of the statutory development plan. However they should be subjected to rigorous procedures for community involvement.
- 5.3 Supplementary Planning Documents are not statutory documents in the same way the UDP itself is but are material considerations to be taken into account when determining individual planning applications.
- 5.4 Planning Policy Statement 12 'Local Development Frameworks' sets out the procedural policy and process of preparing Local Development Documents including Supplementary Planning Documents. The South Kilburn SPD has been prepared in accordance with the guidance contained within PPS12. As required by the new planning regulations, the Council consulted the public and stakeholders on the pre production draft SPD and formal public consultation was undertaken on the draft Supplementary Planning Document.

## **6.0 Diversity Implications**

- 6.1 An inclusive approach to public consultation has been undertaken to ensure that different groups had the opportunity to participate and are not disadvantaged in the process.

## **7.0 Staffing Implications**

- 7.1 These will be contained within existing budgets.

## **8.0 Environmental Implications**

- 8.1 The objective of the SPD is to ensure the long term physical and environmental regeneration of South Kilburn. Under the Town and Country Planning Act 2004 Regulations (which accompany the Act) the Council also has to complete a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA) requirements). The function of the SA/SEA is to systematically appraise any likely social, economic or environmental effects of the SPD.
- 8.2 A Sustainability Appraisal Scoping Report was prepared in November 2004 setting out the initial context and findings of the SA and the proposed approach to the appraisal process.
- 8.3 The draft SA predicts the effects and provides a detailed assessment of the effects of the draft SPD and proposes measures to maximise beneficial effects and mitigate adverse effects of the SPD. Consultation on the SA was also undertaken from 7<sup>th</sup> February until 7<sup>th</sup> March 2005. At the time of writing three comments were received on the SA. The comments received from English Heritage generate minor amendments to the SA for accuracy. However, they do not require the SA to be significantly revisited or the SPD to be amended.

## **9.0 Background Papers**

Details of Documents:

- 9.1 Summary of Responses from public consultation on the South Kilburn Supplementary Planning Document
- 9.2 South Kilburn Supplementary Planning Document Consultation Draft

Contact Officers

Any person wishing to inspect the above papers should contact Gen Hewett, The Planning Service Brent House, 349 High Road, Wembley, Middlesex HA9 6BZ,  
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## Appendix 1A

### DRAFT SOUTH KILBURN SUPPLEMENTARY PLANNING DOCUMENT ISSUES RAISED THROUGH PUBLIC CONSULTATION

(Responses received up to 31<sup>st</sup> March 2005 from individual consultees)

Contact Details	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
Mr Norman Home 187 Harvist Road London NW6 6HB	There is an urgent need for improvements to Queens Park tube and railway station and cleanliness is a problem. The SPD envisages even greater use of the station and needs to be improved at the same time.	Silverlink are responsible for the cleanliness and any redevelopment of the Queens Park Station. The Queens Park Station area planning brief includes the redevelopment of the Queens Park station and is incorporated into the SK SPD. The Queens Park Station area brief provides further guidance on the redevelopment of the station. The redevelopment of the station itself is dependant on Rail Authority funding priorities.	No amendment to the SPD required or the SA to be revisited.
Richard Lambert 167 Saltram Crescent London W9 3JU	The requirements for roof terraces and loft conversions are too strict. Dormers, roof gardens and balconies are very interesting and should be encouraged.	The SP will be amended to encourage the provision of roof gardens and balconies as part of any new development. Amend Section 3.3.9 (New Homes) External Space to read: The Council will require the design of all new homes to incorporate private open space and access to communal gardens where ever possible. Private open space, to be provided in the form of a balcony, roof terrace or rear garden is particularly encouraged.	Amendments to the SPD required however this change does not require the SA to be revisited.
Barry Lancaster Smith 27b Saltram Crescent London W9 3JR	Very good, please start soon. Don't forget to develop retail post office Chippenham Gardens, and nearby retail site. More cycle routes, trees and green space. Wide pavements, low rise buildings, restoration of historic quarter. Public art and sculptures. Make it interesting!	The SPD requires the provision of safe and efficient cycle routes, the provision of new street trees as part of the public realm improvements and public art. The SPD also seeks an increased provision of public open space consisting of Neighbourhood Greens and Neighbourhood Squares. The SPD includes historic quarter guidance to ensure the character of the area is maintained and enhanced and provides new retail uses within an enlarged square at Chippenham Gardens where the Post Office can relocate (however the decision to relocate is up to the Post Office).	No amendment to the SPD required or the SA to be revisited.
Hilary Anderson 21 Marshall House Albert Road London NW6 5DS	Will there be homes large enough to accommodate a family of 8. (2 adults & 6 children). We are statutory overcrowded and in great need of a larger home.	Yes there will be provision of larger homes. Council tenants will be interviewed and at allocation time the individual household needs will be assessed at their requirements taken into account.	No amendment to the SPD required or the SA to be revisited.

Contact Details	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
The Owner/Occupier 85 Kempe Road London NW6 6SN	Maps on pages 2,3,4 and 7 of the consultation leaflet are too small.	The relevant full page maps from the draft SPD were sent to the respondent.	No amendment to the SPD required or the SA to be revisited.
Stephen Hines 344 Kilburn Lane London W9 3EF	The car park adjacent to Queens Park station should be converted into a bus station, with direct access to the adjoining rail facility. This may encourage the rail companies to develop a revised stopping pattern for intercity services.	The SPD requires improved integration of the public transport system by creating and improving physical links between different modes of transport at Queens Park and Kilburn Park stations. The Council will require accessibility and connectivity improvements to public transport at Queens Park Station, with consideration given to reducing the distance between bus stops and the station, improving pedestrian crossing facilities, providing a dedicated area for buses to stop, turn and terminate and increasing the number of stops to adequately accommodate to frequency of existing and future bus services. The Queens Park Station area planning brief includes the redevelopment of the Queens Park station and is incorporated into the SK SPD. The Queens Park Station area brief provides further guidance on the redevelopment of the station. Any redevelopment or improvements to the Queens Park routes or stopping are dependant on Rail Authority funding priorities.	No amendment to the SPD required or the SA to be revisited.
Anthony Dunn Garden Flat 44 Montrose Avenue Queen's Park London NW6 6LB	There is plenty of discussion of the changes to the physical environment but what about measures to change the way the inhabitants behave? Many of the issues found in the area have less to do with the physical infrastructure than the social aspects. What measures are planned to encourage positive behaviour and involvement by the kids in the area? It is basic human psychology that people tend not to despoil something that they feel a part of/about which they have some sense of ownership. What is to be done to develop and promote this sense in the inhabitants of SK?	One of the elements of the NDC's vision for South Kilburn is to create a safe neighbourhood, free from crime and the fear of crime. The key role of the SPD is to address the physical environment, although this will have implications for social and economic aspects. To ensure ownership of these physical changes the SPD in line with the new Planning Act requires extensive local public involvement in the design of schemes for private and public spaces.	No amendment to the SPD required or the SA to be revisited.
Elizabeth Sheldrake 99c Malvern Road London NW6 5PU	The SPD should also cover the end of Malvern Road to knock down disgusting former Mercedes Garage to uncover the most beautiful house in the road.	Malvern Road is included within the SPD and specifically forms part of the Village Quarter. Section 4.2.2 (Private Sites) identifies the Mercedes Garage site as a private site that could contribute to the	Amendments to the SPD required however this change does not require the SA to be revisited.



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		<p>regeneration of South Kilburn as and when it becomes available for redevelopment. The SPD states that part of the Mercedes Garage site is included on the local list and therefore demolition will be discouraged of the locally listed building however the Council will support the demolition of the garage at the front of the site and restoration of the locally listed building. Any redevelopment would need to take into account the historic value of the locally listed building on the site.</p> <p>For clarity the following amendment is proposed:</p> <p>“The former Mercedes Garage site is included on the local list and therefore demolition will be resisted, except for the modern vehicle showroom building, and any redevelopment should retain and enhance the building to the rear.”</p>	
DM Furlong 34 Harvist Road London NW66SH	Redevelopment of Queens Park Station and surrounding area is urgent. Concerned that high density housing and high rises will lead to further ‘ghettos’ in the area. Have we not learned a lesson from the awful high rise Council flats in the area.	The SPD requires improved integration of the public transport system by creating and improving physical links between different modes of transport at Queens Park and Kilburn Park stations. The Council will require accessibility and connectivity improvements to public transport at Queens Park Station, with consideration given to reducing the distance between bus stops and the station, improving pedestrian crossing facilities, providing a dedicated area for buses to stop, turn and terminate and increasing the number of stops to adequately accommodate to frequency of existing and future bus services.	No amendment to the SPD required or the SA to be revisited.
		The Queens Park Station area planning brief includes the redevelopment of the Queens Park station and is incorporated into the SK SPD. The Queens Park Station area brief provides further guidance on the redevelopment of the station. Any redevelopment or improvements to the Queens Park station are dependant on Rail authority funding priorities.	No amendment to the SPD required or the SA to be revisited.
		A limited number of higher blocks are proposed. This will be significantly less than at present and only in appropriate locations. The housing will be high quality design, mixed tenure and better managed.	No amendment to the SPD required or the SA to be revisited.

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		The SPD requires overall an average density of 550 habitable rooms per hectare. Despite the number of high rise buildings the actual current density of the area is lower than the surrounding area. Higher densities will be sought in appropriate locations in line with Government Policy.	
Anonymous	The respondent supports the 20mph restrictions and improved provisions for cyclists. The respondent requested that the chain stores/supermarkets be kept out of the development. The respondent also stated that it was assumed although not totally clear that the tower blocks are to be demolished and stated that they were an eyesore.	Section 3.2.4 of the SPD states that the level and extent of commercial development proposed must reflect the nature of existing parades and potential impact on other centres and the transport network. The Council has to consider any application that is submitted and must consider the impact of any proposal rather than the organisation or the developer. The SPD propose to demolish and redevelop 1534 properties and retain and refurbish 775 properties. 1419 new homes will also be built. The only high blocks proposed to be retained are William Saville and William Dunbar. A full list of the blocks to be demolished is contained within the Masterplan.	No amendment to the SPD required or the SA to be revisited.
Mr J Ownes 11 Brondesbury Road NW6 6RX	Most concerned at the proposed building heights of blocks next to the railway line. This will directly adversely impact existing residents on the other side of the railway line in terms of light, noise and privacy.	A sunlight and daylight assessment will be required with any planning application to ensure that the location and height of proposed buildings will not create adverse effects on the amenity of existing and future residents in terms of any loss of light. Any planning application must be accompanied by relevant assessments concerning railway noise and vibration. The SPD also requires the buildings to be designed to avoid proximities that cause problems of privacy and overlooking. To avoid any noise and privacy issues it is likely that only windows to non habitable rooms will face the railway line.	No amendment to the SPD required or the SA to be revisited.

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Councillor Reg Freeson Room 216 Brent Town Hall Forty Lane Wembley, HA9 9HD	Figure 3.2 - Carlton vale roundabout should not be built over. In redesigning as a controlled junction, this mature green and tree planted space should be retained as a small POS for adjoining new development; make good 'loss' thus of housing by reconfiguring nearby density.	The SPD proposes the replacement of the roundabout and above ground pedestrian crossing facilities and the creation of a four arm traffic signal junction that would be more compatible with the urban character of the area and releasing significant space for development and the provision of high quality public open space adopted by Council. The SPD does allow for alternative solutions if it can be demonstrated that the alternative provides equal or greater transport efficiency whilst allowing for land release to assist with the wider regeneration aims of the SPD. This would be required to form part of the Transport Assessment.  For clarify Section 3.3.5 Streets and Movement (Carlton Vale Roundabout)Insert additional sentence at end of para to read: " This could include retaining the roundabout as open space acting as a buffer to buildings around it".	Amendments to the SPD required however this change does not require the SA to be revisited.
	Community Facilities – define “small scale community facilities”. Why site at top of Cambridge Ave near to the variety of alternatives in Kilburn High Road already available? Ditto – Malvern Road? Ditto – west end of Kilburn Lane, where there is already sited the Moberley Centre? Generally (i) such provision does not relate to developing extended schools policy and (ii) it is not clear how the proposals will relate to new POS areas.	Policy CF2 defines small scale community facilities as facilities serving a neighbourhood. The three sites specified will provide small scale community facilities providing local facilities within each of the neighbourhoods within South Kilburn and will be within close proximity to proposed locations of new areas of public open space. This approach has been endorsed by the approved Masterplan.	No amendment to the SPD required or the SA to be revisited.
	Where specifically is a Community Centre to go in the (private) redevelopment of 3-6 Bannister Road? How will it relate to the Moberly Centre immediately opposite?	3-6 Banister Road is predominately a live-work scheme, however a single ground floor live/work unit will be handed over to the South Kilburn New Deal for Communities for the use of the community. The unit adjacent to No's 1&2 Banister Road has been allocated for this purpose.	No amendment to the SPD required or the SA to be revisited.
	What discussion with Brent Community Housing, BHP and tenants association about the future of the Allington Road Community rooms?	The SPD seeks either the replacement or retention of the Kilburn Claremont Allington Tenants Association Flat, Allington road. This has been endorsed by the approved Masterplan.	No amendment to the SPD required or the SA to be revisited.
	What is present status of OK club redevelopment application? Indication needed of how it will	The proposed officer amendments to the SPD state that the redevelopment of the OK Club site may be	No amendment to the SPD required or the SA to be

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	relate to nearby Peel Precinct sports centre and other community facilities ?	reconsidered subject to the reprovision of the community use. The appropriate additional use would be residential. However any redevelopment needs to consider proposals for the wider area as set out in the SPD. This would include the proposed community facilities within the vicinity of Peel Precinct.	revisited.
	Granville and Carlton Centres development and refurbishment already in hand, including their amenity space.	Yes the Granville and Carlton Centres are currently in the process of being extended.	No amendment to the SPD required or the SA to be revisited.
	What is the Vale Centre?	The Vale Community Centre in Nelson Close is a community facility.	No amendment to the SPD required or the SA to be revisited.
	Query loss without replacing tenants' halls etc in blocks to be demolished.	The SPD states that the Council will accept the loss of tenant halls not specifically identified for retention or replacement subject to the provision of dedicated community facilities within the Urban, Historic and Village quarters.	No amendment to the SPD required or the SA to be revisited.
	Health Facilities – Section 106 contributions should be sought along with other funding, not just where the latter may not be available. Where in Malvern Road is a new health centre to go? Another example of the need for a coordinated site assembly strategy.	Financial contribution from the developer may not be required if another funding source has been secured.  Figure 3.1 Proposed Land Uses for South Kilburn of the SPD identifies the location for proposed community facilities.	No amendment to the SPD required or the SA to be revisited.
	Link such sites and development with other facilities, in particular with children's and family centres under extended schools policy.	Although a comprehensive approach is supported the provision and location of community facilities extend beyond education policies.	No amendment to the SPD required or the SA to be revisited.
	Education- This section is inadequate. Certainly seek developers contributions towards additional education provision; but as stated the text ignores Government and LEA basic responsibilities for site assembly and development.	Contributions will be sought in line with Policy CF6 of the UDP.  Additionally Section 3.2.2 Community Facilities (Education) end of 2 <sup>nd</sup> para. Add the following sentence: "The Council will work with the SKNDC and the DFEE to secure appropriate resources to assemble sites and develop suitable school provision."	Amendments to the SPD required however this change does not require the SA to be revisited.
	The SPD should state and exemplify that open	All public open space is to be adopted by Council and	Amendments to the SPD

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	space and environmental policy go well beyond formal POS designation.	designated as public open space which will protect them from future development. However, the following amendment is proposed to Section 3.2.5 Public Open Space (The provision of public open space). Add to end of 1 <sup>st</sup> para “.. Currently there are many informal public open spaces within South Kilburn which the Council would wish to protect or reprovide as part of any development.”	required however this change does not require the SA to be revisited.
	Where is the re provision of the Granville Road POS to be? It should be planned at the start of the site being developed for housing and be included in its programme. Five years is unnecessarily too long to wait for re provision. The same approach should be taken regarding the loss of any open space, amenity and play areas.	The SPD states that the Council will accept the development of the Granville Public Open Space subject to a condition requiring replacement provision in the locality (of the same quantity and improved location and quality) within 5 years of the occupation of the new homes unless an application is agreed within the period which establishes the re provision as part of a wider agreed open space framework. 5 years is proposed to fit in with the phasing and implementation of the Masterplan. A temporary pocket park will be provided on part of the Granville site and will be available for residents. When the Master plan is implemented this pocket park will be redeveloped in line with the Masterplan proposals and overall public open space framework for South Kilburn.  Due to the large scale of the South Kilburn area, its land constraints and the extent of work needed to meet regeneration objectives a phased development is required. It is recognised that the development of public open space will be required to facilitate the start of the process. Granville Public Open Space will be the first development site.  Nevertheless, the following amendment is proposed to Section 3.2.5 Public Open Space (The provision of public open space) end of 6 <sup>th</sup> para “..Any outline application should demonstrate how the Granville Public Open Space will be reprovided throughout the development area.	Amendments to the SPD required however no change to the SA is necessary.

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	<p>Wildlife Corridors – Has the Silverlink Railway line been identified as not having any nature conservation value?</p> <p>This should be reviewed. While it may be true preparatory to producing the Brent Handbook, today the line and its embankments teem with squirrels, foxes, variety of birds, insects, trees and plant life.</p>	<p>The edge of the railway line adjoining South Kilburn has been identified as having little intrinsic value as it has not significant vegetation along it. However the SPD will be amended following comments from the London Wildlife Trust and Councillor Freeson to state that a landscape edge is likely to be required along the northern boundary of development sites adjacent to the railway line to provide a buffer to attenuate the effects of noise, to provide a reasonable level of amenity for future occupants and to contribute to the value of the wildlife corridor.</p>	<p>Amendments to the SPD required however no change to the SA is necessary.</p>
	<p>Would it not be sensible, even if medium to long term to replan the whole leg of South Kilburn? This is not to suggest wholesale demolition, but reshaping it partly in transportation and green environmental terms and linked to redeveloping Queen's Park Station?</p> <p>Meanwhile, there could be refurbishment for a given span and reshaping of its 'village' type core, in co-operation with its present residents.</p>	<p>The South Kilburn leg is a distinct but somewhat isolated part of South Kilburn. It has good physical connections to West Kilburn, Kensal Green and Kensal Rise. Section 3 of the SPD provides detailed design guidance for the Artisan Quarter. It states that there are no areas of public open space within the Quarter and therefore requires the need for high quality proposals with relation to other parts of the public realm.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>Layout &amp; Urban Form – Urban Structure – 4<sup>th</sup> bullet point. There should be more generous green set backs on main thoroughfares and preferably 'non habitable' rooms and facing entrances facing onto such roads.</p>	<p>Where the urban structure is to be developed and re-made the SPD requires a forecourt to be provided with a minimum setback of 1.5m. This does not preclude a greater setback to be provided.</p> <p>For greater clarification Section 3.3.1 Layout and Urban Form the SPD has been amended to read" ii) Where the Urban Structure is to be developed and re-made a forecourt should be provided with a minimum setback of 1.5m. Where feasible the Council will encourage greater setbacks on main thoroughfares"</p>	<p>Amendments to the SPD required however no change to the SA is necessary.</p>
	<p>Variable density and housing types should be provided within overall density and provision eg ¾ bedroom houses and maisonettes at 170-180 hrh, offset by higher density and smaller units with the same 'blocks' or sites.</p>	<p>The SPD requires new buildings to create well designed street frontages and respond to their location including the street.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>Density -8<sup>th</sup> of 2<sup>nd</sup> bullet points list: Child density reference too vague. All research studies indicate 18-20% density for children of different ages to be the right level, above which serious</p>	<p>The density specified in the SPD is in accordance with Policy 4B.3 of the London Plan, UDP Policy H13, TRN6 (Intensive Development at Selected Transport Interchanges) and the Council's SPG17. The proposed</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>

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	<p>family, social and management problems are experienced. The SPD should prescribe such a range explicitly.</p> <p>Page 31 first line of last paragraph – does the figure fit with diagrammatic figure on following page? Third line – what are the hrh and hph figures and child densities in the surrounding areas?</p>	<p>density will be comparable to the existing areas surrounding South Kilburn, with an average density of 550 habitable rooms per hectare.</p> <p>Agreed, the reference to Figure 3.3 (Urban Design Plan) on page 29 should refer to Figure 3.4. The SPD has been amended to read “Figure 3.4 (Urban Design Plan).</p>	<p>Amendments to the SPD required however no change to the SA is necessary.</p>
	<p>Last sentence above Figure 3.6 Proposed Density is unclear. And key shading areas, do not reflect existing or possible future development. Amend last para to reflect comments above.</p>	<p>Figure 3.6 of the SPD reflects the built form and perimeter blocks proposed by the approved Masterplan. No changes to the density section are considered necessary in response to these comments.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>Page 33 add in first para the possibility of high development over Kilburn Park station in Cambridge Ave.</p>	<p>The SPD specifies the locations where high buildings are considered acceptable. Kilburn Park Underground station is a Grade II Listed building and any building over it is considered to affect the integrity of the building.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>In 2<sup>nd</sup> para consider too the avoidance of family housing. High rise buildings should emphasis small dwellings allowing low rise family dwellings elsewhere.</p>	<p>The SPD requires a mix of sizes across all tenures ranging from one bed up t to four bedroom family flats.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>Should the text specifically refer to homes being incorporated in public service and commercial buildings? The boxed summary should extend to cover the points made here.</p>	<p>The SPD (Section 3.3.1) specifically states that with the exception of the indoor sports facility at Peel Precinct the Council will require residential units above the ground floor community and commercial uses.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>Context, Style, Functionality, Composition, Materials and Construction Detail – the jargon should be translated.</p>	<p>Comments noted however this section sets out the detailed design requirements, as part of the framework for the development of South Kilburn that will be required to be incorporated into any scheme.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>
	<p>A swimming pool should be included in the new Peel Precinct health and sports centre.</p>	<p>A dry indoor sports facility is proposed which does not include a swimming pool. The building, management and maintenance of a public swimming pool is very costly. The Willesden Sports Centre is currently being redeveloped which will include a swimming pool and the Jubilee Sports Centre also has a swimming pool.</p>	<p>No amendment to the SPD required or the SA to be revisited.</p>

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		These facilities are within the proximity of South Kilburn and residents have the ability to visit these pools.	
	Home zones seem to get an uncertain mention in the SPD. They should be given firm backing as part of environmental enhancement and improving quality of life. Precise sites may be difficult to identify at SPD stage, but indicating where they would be desirable could be given within design considerations.	Figure 3.8 Proposed Transport and Movement Plan identifies possible locations of suitable home zones. However the following amendment is proposed. Section 3.3.5 Streets and Movement (Creation of home zones) has been amended to state "...and Highway Authority at an early stage. The Council will consider home zones in other appropriate areas other than those indicated on Figure 3.8 Proposed Transport and Movement Plan).	Amendments to the SPD required however no change to the SA is necessary.
	References to energy efficiency etc should be strengthened.	Section 3.3.14 provides detailed guidance on the requirements for Sustainable Development including energy efficiency and renewable energy. However, the SPD will be amended following comments from the GLA and Councillor Freeson to state that consideration should be given to the feasibility of other energy efficient and renewable energy technologies.	No amendment to the SPD required or the SA to be revisited.
Vera Cook 16 Ely Court Chichester Road Kilburn NW6 5QR	Disagrees with the demolition of Ely Courts and Cambridge Courts as the flats are in good condition.	The decision about which homes should be refurbished and which ones should be redeveloped was carefully considered during the Masterplan process. This was based on the condition of the buildings, achieving other objectives of the NDC and Brent Council (including improved health and better training and education opportunities which relies on providing better homes and community facilities), design reasons, and financial reasons.	No amendment to the SPD required or the SA to be revisited.
Jana & Peter Burt Jones 110 Brondesbury Road London NW6 6RX	Section 3.3.1 One lesson that has been learned only too well – not least in South Kilburn - is that high-rise public housing does not promote healthy communities.	The objective of the SPD is to ensure a mix of housing type and tenure, provide improved community, leisure, health, education facilities, public open space and public realm improvements. The NDC also has other initiatives to promote healthy communities. A balance is needed to provide an appropriate scale of homes and the overall viability of the scheme. Most of the re-provision will be in the form of low-medium rise housing around secure private courtyards.	No amendment to the SPD required or the SA to be revisited.



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	Figure 3.4 Urban Design Plan in the SPD indicates that a wall of tall buildings between 200 and 300 metres long and varying between 10 and 20 stories high will be constructed between the north side of Albert Road and the railway line.	<p>A predominant building height of 4-6 storeys will be required across South Kilburn. A limited number of higher blocks are proposed. This will be significantly less than at present and only in appropriate locations. New high buildings are considered appropriate around the Queens Park station area, at the junction of Cambridge Avenue and Kilburn High Road and at the Albert Road junction with Queens Park station.</p> <p>Section 4.3.1 Design Guidance for the Urban Quarter (Scale, Height, Massing and Density) identified that the building heights along Albert Road will be staggered with 10-15 storeys near the Queens Park Station, 15-20 storeys within the proximity of the existing Albert Road Day Centre and 6-7 storeys towards Canterbury Terrace. The building form as indicated is indicative and may change.</p>	No amendment to the SPD required or the SA to be revisited.
	How will this re-connect and re-integrate the dislocated community of South Kilburn with the neighbouring community of West Kilburn, parts of which (Brondesbury Road and Brondesbury Villas) are much closer to Albert Road than much of South Kilburn.	The re-connections and reintegration of the community will be provided through improved the street network, the location of public open space, co-location of facilities, and improved community facilities.	No amendment to the SPD required or the SA to be revisited.
	This will be out of scale with both the existing Victorian landscape on both sides of the railway line, and with the perimeter blocks of the new development, and it will be far more successful than the form of the existing landscape in isolating and alienating communities. It will dominate the northern landscape of South Kilburn residents and the southern landscape of those living in West Kilburn.	<p>The SPD requires overall density of 550 habitable rooms per hectare. Despite the number of high building the actual current density of the area is lower than the surrounding area.</p> <p>A sunlight and daylight assessment will be required with any planning application to ensure that the location and height of proposed buildings will not create adverse effects on the amenity of existing and future residents</p>	No amendment to the SPD required or the SA to be revisited.
	Its impact on the visual environment of the Kilburn and Queen's Park Conservation Areas will be seriously adverse.	Section 3.3 of the SPD requires all proposals to consider the contribution to and the impact on the wider community and landscape. This Section also requires all proposals to consider how it fits in to the surrounding area.	No amendment to the SPD required or the SA to be revisited.

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	<p>The scale of this element of the proposed development seems to fly in the face of the principles adumbrated with such passion in the document – the requirement to ‘lean the lessons of the past’ and consider ‘the needs and contribution of existing buildings (particularly ... buildings within Conservation Areas)’; and the precept that ‘The opportunity to develop and improve on a buildings role in the development or termination of a view should not be lost’.</p> <p>It would be much more appropriate for the buildings on the north side of Albert Road to be to the same scale as the residential blocks on the other side of the road.</p>	Section 3.3.2 Scale and Density and Building Scale and Height sets out the appropriate scale of development for South Kilburn.	No amendment to the SPD required or the SA to be revisited.
Peter Jones 152 Hereford House Carlton Vale London NW6 5QH	<p>Section 3.3 Perimeter Blocks</p> <p>Concern expressed relating to the layout and design of accommodation within perimeter blocks. Areas which need particular attention are the planning of rooms next to internal corners, especially those with acute angles, to ensure adequate daylight to all rooms but avoid overlooking.</p>	<p>Section 3.3.1 Urban Form states that “ The dimensions of blocks must be determined within consideration to location, relationships and amenities of future occupiers. The Council will require a full sunlight and daylight assessment to ensure that all residents enjoy an acceptable level of sun and daylight.”</p> <p>Section 3.3.1 Composition requires the composition and arrangement of buildings to consider the avoidance of proximities that cause problems of privacy and overlooking.</p>	No amendment to the SPD required or the SA to be revisited.
	<p>Section 3.3 Landmark Buildings</p> <p>The detailed design of tall buildings is crucial to their success or failure, and not just at street level, but also the tops for views from around the townscape. The design of the tops of towers will be important to the contribution of the project to the wider townscape and particularly views from Kilburn Park and other surrounding areas.</p>	Agreed. Section 3.3.3 Architectural Quality sets out the Councils requirements for high quality buildings in composition, , architectural style, materials, detail and accommodation that they provide.	No amendment to the SPD required or the SA to be revisited.
	<p>Section 3.3 Retained blocks</p> <p>Some of the refurbished accommodation buildings could look rather tired in relation to new buildings. Their appearance will need to be considered as a major aspect of the appearance</p>	Section 3.3.3 Architectural Quality sets out the requirements for all buildings which would include refurbished and new build.	No amendment to the SPD required or the SA to be revisited.

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	of the redeveloped site as a whole. There is no information about the potential external works for retained buildings, and no specific reference in the SPD. For example Alpha, Gorefield, and Canterbury Houses dominate the views along the walk from Peel Precinct to the Kilburn High Road. These buildings have limited architectural merit to currently recommend their retention.		
	Section 3.3.7 Other residential development The quality of the basement car parking spaces could erode the overall richness of the scheme if great care is not taken in their design, including such issues as ventilation and lighting.	The design and quality of basement car parking would be subject to Building Regulation and Environment Health Standards and part of the Secured by Design certification requirement. However for clarity Section 3.3.7 Parking Standards (Design of car parks) an additional sentence has been added to the end of the para to state "The quality of the basement car parking spaces could erode the overall richness of the scheme if great care is not taken in their design, including such issues as ventilation and lighting."	Amendments to the SPD required however no change to the SA is necessary.
	Section 3.3.2 Health Care Facilities Concern expressed about the limited resident involvement so far in the discussion/design process for the Healthy Living Centre adjacent to Peel Precinct. The primary purpose of this building must be to provide improved health facilities for the local community, and this should not be unduly sacrificed to health providers area administration and accommodation needs. This compromise seems currently to be imbalanced towards PCT needs over resident user needs.	The aim of the SKNDC is to ensure that community benefits are maximised from any capital development proposed and planned in the area. This may involve residents being engaged in the procurement, design and delivery of capital projects.  There are different methods of engagement and participation and it will be down to the PCT to devise a strategy that is satisfactory to the Council, SKNDC and residents.	No amendment to the SPD required or the SA to be revisited.
	It needs to be clearly established whether or not mixed use, including resident accommodation, is or is not going to apply to this building.	Text box Section 3.3.1 states that with the exception of the indoor sports facility at Peel Precinct, the Council will require residential units above the ground floor community and commercial uses.	No amendment to the SPD required or the SA to be revisited.
	With a number of doctors involved, more thought also needs to be given to parking space availability.	Agreed. Parking requirements for the community facilities will be as per the UDP requirements. However an amendment to Section 3.3.7 (Parking for	Amendments to the SPD required however this change does not require the

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		<p>non residential development) is proposed by adding an additional sentence to read "As part of any new health care facility some road space parking could be given over to accommodate key health workers."</p> <p>A Travel Plan will also be required as part of any planning application to indicate how reliance on vehicles will be reduced.</p>	SA to be revisited.
	The provisional internal design suggestions for this are confused. There no signs that the PCT/LIFT want to deliver a building which is in the best interests of satisfying community user needs, nor that the PCT/LIFT are aware enough of the requirements of resident consultation set out in the draft SPD.	See comments above	No amendment to the SPD required or the SA to be revisited.
	Any garden space as part of the Healthy Living Centre site ought to be available as communal space for Carlton House residents.	This is a matter that will be considered as part of a detailed planning application.	No amendment to the SPD required or the SA to be revisited.
	<p>Section 3.3.2 Building Scale and Height Development along the Railway Line in Albert Road</p> <p>of 10 to 15 storey blocks causes concern in design terms. The visual appearance of these buildings is particularly important as this is part of the 1<sup>st</sup> phase of redevelopment, and it's success will be crucial in establishing demand for and confidence in future sales.</p> <p>These buildings will need to be well-designed to produce buildings of character and vitality, that will also provide a sense of pride for occupiers, current residents in the area, and visitors alike.</p>	<p>The design and architectural quality of these buildings will be subject to the requirements set out in Section 3.3.3 Architectural Quality for all buildings.</p> <p>However, it is proposed to amend the SPD Section 3.3.2 Scale and Density, by adding the following sentence at the end of the first para. "They will need to be well designed to produce buildings of character and vitality, that will also provide a sense of pride for occupiers, current residents in the area, and visitors alike."</p>	Amendments to the SPD required however no change to the SA is necessary.
	<p>Section 3.3.7 New Residential Units near public transport nodes</p> <p>Proposing extensive car-free developments close to stations is acceptable. However,</p>	Agreed. The Queens Park Station area planning brief includes the redevelopment of the Queens Park station and is incorporated into the SK SPD. The Queens Park Station area brief provides further guidance on the redevelopment of the station. Any redevelopment	No amendment to the SPD required or the SA to be revisited.

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	proposing car free in the vicinity of Queens Park Station in the context of no improvement in current station facilities causes concern.	or improvements to the Queens Park station are dependant on Rail authority funding priorities. Refer to Network Rail comments on capacity improvements to Queens Park station	
	<p>Section 3.2.5 Public Open Space</p> <p>South Kilburn Park is currently an open space of little or no value for local residents. Its position bordering Carlton Vale is unfortunate. The only current facility it has is an impoverished children's' play area which just a few yards away from a major through road, and without any kind of screening works. Although it is a useful extra play area for Kilburn Park Foundation School</p>	<p>The land constraints are such that is not feasible to relocate the park and it is Council's intention that this park will be improved. Consideration of detailed matters and any improvements will be considered as part of a planning application.</p> <p>The present location of the children's play area is intended to provide maximum visibility to ensure there is adequate natural surveillance from the surrounding area.</p>	No amendment to the SPD required or the SA to be revisited.
	The SPD should outline specific expectations regarding this space rather than vague aspiration of "improvements."	Financial contributions from the developer will be required for extensions and improvements to the quality of the park will increase its value placed on it by local residents . It is likely that there will be resident participation in deciding what are appropriate improvements to the park.	No amendment to the SPD required or the SA to be revisited.
	With the proximity of Queen's Park and the Paddington Recreation facilities this site could be redeveloped or at least reduced, as its size and location will always make it very difficult to do anything with that is worthwhile, where it will have real value for local people. Bordering a busy through road will always make it difficult in landscaping terms to provide a space of value.	Kilburn Park is designated and protected as public open space. Improvements to Carlton vale will contribute to the park's attraction. The park contributes to the overall open space strategy for the area and is a valuable resource for the primary schools and the local community. The refurbishment and extension of the Carlton and Granville Centres, the sports complex and other proposed improvements to the area will place demands on open space. Kilburn Park will contribute towards the provision in the area.	No amendment to the SPD required or the SA to be revisited.
	Concerned that a potential major landscaping project like this becomes an afterthought, especially in the context of proposals by the ODPM to change planning obligations and Legal Agreements. This could have significant implications for the physical regeneration of South Kilburn.	A full landscaping and open space strategy will be required with any future planning applications.	No amendment to the SPD required or the SA to be revisited.

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	Section 3.3.5 Carlton Vale Regarding the proposals for turning Carlton Vale into a "tree lined boulevard" - I'm far from convinced how this will effect any worthwhile change.	The worthwhile changes to Carlton Vale are that it improves facilities for pedestrian cyclists and buses. The improvements will also increase pedestrian safety and may provide further on street parking which are considered as important benefits within the overall scheme.	No amendment to the SPD required or the SA to be revisited.
	Granville Homes  A major concern is that this project is going ahead before there is any agreement to acquire the land necessary to re-link Granville road.  Also as this is this presumably is not going to be a car-free development:  There doesn't seem to be enough road space for the provision of sufficient on-road car parking spaces as specified in the UDP, in the immediate area for the proposed number of units.	Granville New Homes is a project implemented 2 years prior to the major physical work planned for South Kilburn commences. As such it is a phased project which has been developed with all known constraints (including the joining of Granville Road) built in.  The Masterplanners have calculated that there is sufficient road space for carparking as set out in the SPD. The Council will also be seeking through legal agreements improvements to public transport, provision of car free in appropriate locations, city car clubs and incurtialge parking for private residential development. These measures in combination with CPZ's should allow adequate road space for remaining residents.	No amendment to the SPD required or the SA to be revisited.
	There is the added problem of competing with the need for car parking space for the proposed healthy living centre, and spaces for the Carlton Centre, and the Granville Centre.	The facilities will largely be for local people who will use non car means of access. These will have limited parking and controlled by CPZ's.	No amendment to the SPD required or the SA to be revisited.
	Thought will have to be given to prohibiting the Youth Centre from hiring out the venue for parties, which often cause considerable noise nuisance.	The management of the youth centre will fall within the guidelines of OFSTED and Brent Education. All community buildings must operate under licensing laws which restrict their use and times of opening.	No amendment to the SPD required or the SA to be revisited.
	Section 5.6 Public Consultation Requirements  Schemes must be illustrated in an understandable way to lay people especially	Comments noted Section 3.3.3 Design Presentation sets out the requirements for communicating design quality as part of future planning applications.	Amendments to the SPD required however no change to the SA is necessary.

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	<p>when they are entitled to express a view through the planning consultation process. Often schemes are difficult to understand by residents and lay people.</p> <p>The biggest difference is the extent to which a project is illustrated in its context. A well-illustrated project should include, as well as basic plans, sections and elevations of proposed buildings:</p> <ul style="list-style-type: none"> <li>• Plans at different scales which allow you to zoom in from a plan of the area to the immediate surroundings of the site and then to the site itself.</li> <li>• Enough plans and elevations to show clearly, and compare, both what exists at present and what is proposed.</li> <li>• Context elevations (before and after)</li> <li>• Views from everyday viewpoints to illustrate before and after.</li> </ul> <p>Flat plans are incomprehensible to most people Impressions of front and rear elevations with the obligatory mature trees aren't much more informative</p> <p>There should be a clear statement in the SPD of expectations with regard to future planning applications to make submitted plans both more user friendly for local residents, and also to give a clearer impression of what buildings will actually look like in context. Otherwise all statements regarding meaningful planning consultation are meaningless.</p> <p>The difficulty for the average resident to understand proposals in planning applications effectively debars them from the process and professionals take over.</p>	<p>Section 5.6 Public Consultation Requirements also requires any developer to work with the SKNDC and Council to identify appropriate consultees and methods of involvement and a consultation strategy at an early stage for significant planning applications. However for clarity an additional bullet point will be added to Section 3.3.3 Deisgn Presentation to read "The applicant should work with local residents to ensure that schemes are presented in an understandable way."</p> <p>The concerns expressed could be reiterated during preparation of the consultation strategy.</p>	
	Section 3.2.1 Number and Tenure of Homes	The issue of mixed tenure both within blocks and	

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	The mix in each block is potentially problematic. We could be putting ourselves between a rock and a hard place. Depends what we mean by a "block". If it doesn't mean that all blocks should have social/private mix on each floor say – this should be made clear.	between blocks is an issue which will be addressed and confirmed once a delivery vehicle is appointed.	No amendment to the SPD required or the SA to be revisited.
	Section 3.3.1 Text Box Bullet Point- "With the exception of the indoor sports facility at Peel Precinct, the Council will require residential units above the ground floor community and commercial use."  Does this mixed use requirement apply to the Healthy Living Centre adjacent to Peel Precinct?	Text box Section 3.3.1 states that with the exception of the indoor sports facility at Peel Precinct, the Council will require residential units above the ground floor community and commercial uses.	No amendment to the SPD required or the SA to be revisited.
	Section 3.3.5 Text Box Page 51 "Require improved access to Albert Road."  Improved access from where?	The improved access to Albert Road will be part of the wider improvements to Premier Corner. Detailed access improvements will be examined through the Transport Assessment. However they may include allowing all movements in and out of Albert Road rather than the current left in and left out arrangement, and associated pedestrian crossing improvements.	No amendment to the SPD required or the SA to be revisited.
	Section 3.3.7 Text Box Bullet Point - "Other residential developments to incorporate on site basement car parking..." On street parking for replacement social homes? Only underground parking for homes for sale? Shouldn't the SPD be specific about this and make the different arrangements for parking for social/private clear?	Parking for social rented accommodation will be on street. However it maybe possible to provide basement parking for social rented accommodation and shared ownership in certain circumstances.	No amendment to the SPD required or the SA to be revisited.
	Section 3.3.9 Text Box Bullet Point - "The Council will expect all private units to comply with these standards." Has the equal space standards for social/private actually been properly thought through?	Whilst there is an expectation that these standards will be met it is expected for reasons of viability and physical layout. This may not always be possible. The Social housing standards are a requirement. The private housing standards are a desired objective.	No amendment to the SPD required or the SA to be revisited.
	Section 3.3.9 Text Box Bullet Point - "The provision of lifts for all blocks over four storeys."	All new homes are required to be designed to Lifetime Homes Standards, one of its standards is the provision of lifts. The SPD specifies that ground floor units	No amendment to the SPD required or the SA to be revisited.



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	This doesn't make sense. Lifetime homes? Only lifts above 4 storeys? Lifetime homes requirements are more rigorous than only lifts above the 4 <sup>th</sup> floor.	should be for family use, the elderly and vulnerable to ensure ease of access and mobility.	
Martin and Sarah Weise 70a Princess Road London NW6 5QX	Objects to the opening of Princess Road. The beauty and peacefulness are underlined and highlighted by its character as a dead end street.. To open Princess Road for through traffic would create serious danger for all children and pedestrians at all times.	The SPD requires traffic calming measures along all existing and proposed local access roads, including speed restrictions.	No amendment to the SPD required or the SA to be revisited.
Mr Jason Knight 6a Cambridge Gardens Kilburn London NW6 5AE	The draft SPD does not go far enough in addressing the problems experienced by residents in Cambridge Gardens regarding the bus stands.	Comments noted. Although the SPD seeks improvements to the bus stop arrangements through a legal agreement at Kilburn Park station to address noise and air pollution arising from the current location of buses at Cambridge Avenue and Cambridge Gardens, the relocation of bus stops is the responsibility of Transport for London. Therefore although the SPD can seek improvements it cannot require the relocation of the bus stops. However the Council will endeavour to work with TFL to improve the bus stop arrangements.	No amendment to the SPD required or the SA to be revisited.
	A commitment is required to the removal and re-location of bus stands from the Cambridge Gardens residential Conservation area to a more suitable location. The SPD fails in this regard.	As specified above, the SPD has identified more appropriate alternative locations for the bus stands from Cambridge Avenue. The relocation of bus stops is the responsibility of Transport for London, however the Council will endeavour to work with TFL to improve the bus stop arrangements.	No amendment to the SPD required or the SA to be revisited.
	Does not support the proposal for the closure of Coventry Close to Kilburn High Road. Does not believe that the proposed new road from Coventry Close to Cambridge Avenue as a replacement to this closure is an acceptable solution, as there is already considerable traffic congestion at the junction of Cambridge Avenue & Kilburn High Road.	The proposed closure of Coventry Close will be closely examined through the required Transport Assessment.  Coventry Close is within close proximity to Cambridge Avenue. It is proposed to close Coventry Close for highway safety and junction capacity terms to limit the number of uncontrolled junctions at Kilburn High Road. This may result in a more efficient junction arrangement and potentially higher capacity for Cambridge Avenue.	No amendment to the SPD required or the SA to be revisited.

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	Does not believe that further (future) junction improvements to Cambridge Avenue and Kilburn High Road will be sufficient in resolving further congestion in Cambridge Avenue. Therefore this link between Coventry Close and Kilburn High Road must be maintained.	Refer to comments above.	No amendment to the SPD required or the SA to be revisited.
	The SPD makes much claim in re-instating the previous Victorian road layout, to bring about improved connections throughout South Kilburn which have been lost and contributed to a sense of isolation. However, in the proposed 'Village Quarter' there are no plans to re-establish the essential east-west connection of Malvern Road with Malvern Place. This roadway should be re-established with traffic calming measures installed due to close proximity of schools and to prevent the possibility of rat-runs.	Malvern Road and Malvern Place are not indicated as a location of a suitable home zone. It is not intended to reconnect Malvern Road and Malvern Place as the area between the two schools is proposed to be a hard landscaped square as indicated on Figure 3.3 Open Space in South Kilburn.	No amendment to the SPD required or the SA to be revisited.
	Plans within the SPD are contradictory, as in some instances this re-connect road area is categorised as a 'home zone' and in others the road remains a cul-de-sac (which is contrary to the proposed elimination of cul-de-sacs contained within the SPD).	Figure 3.8 (Proposed Transport and Movement Plan) does not show Malvern Road/Malvern Place as a suitable location for a Home zone. No alterations are proposed to Malvern Place. It is not considered that the plans are contradictory.	No amendment to the SPD required or the SA to be revisited.
	Facilities and courses at BACES Carlton Centre will need to be upgraded due to the increase in density.	Agreed. Improvements and extensions to the Carlton and Granville Centres are currently being undertaken.	No amendment to the SPD required or the SA to be revisited.
	A roadway needs to be maintained connecting Granville Road and Princess Road (adjacent to Peel Precinct). Again, plans contained within the SPD are contradictory, as in some instances this is a green area with no roadway, in others it is classified as a home-zone, and in others the existing road is maintained.	Agreed Figure 3.2 and Figure 3.3 indicate that this part of the roadway will be a hard landscaped square. It is intended that this roadway will be opened up with a landscaped square, however the level of detail and the scale of the plans is difficult to show this accurately.	No amendment to the SPD required or the SA to be revisited.
	Given that homes close to transport interchanges will have the benefit of being part of a car-club, the number of properties requiring this facility would put pressure on existing residential parking if no separate parking areas are provided. Therefore existing parking zones	It is the intention of the SPD to create further on street parking provided for residents which will be controlled by a CPZ.  Dedicated car club parking spaces will be required to be provided either within the development or on street.	No amendment to the SPD required or the SA to be revisited.

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	within South Kilburn will require protection and separation, to protect existing residential parking.		
	Consultation of wider stakeholders has not included NTL Communications, a major supplier of telecommunications in South Kilburn.	Comments noted, as the consultation period was extended until 4 <sup>th</sup> April, NtL Communications were consulted during the extended consultation period on the SPD following this comment.	No amendment to the SPD required or the SA to be revisited.
	Concern expressed that the buildings currently proposed lack any architectural benefit and may look dated before the regeneration programme is even complete.	The SPD states that the Council will require that all buildings demonstrate an exceptional quality in overall composition, detail and the accommodation they provide. The detailed design will be assessed when future planning applications are submitted.	No amendment to the SPD required or the SA to be revisited.
	The following buildings provide benefit to the area due to their historic value and quality, and should not be demolished as they provide a link to the quality of housing / buildings within the area prior to the development of the 1960's. Marian Church John Perrin House Falcon Public House	The SPD sets out the statutory and locally listed buildings and the Council will require their protection.	No amendment to the SPD required or the SA to be revisited.
	This is also of particular concern, given that the SPD praises the quality and historic value of John Perrin House, yet also promotes its demolition.	The SPD sets out the statutory and locally listed buildings and the Council will require their protection.	No amendment to the SPD required or the SA to be revisited.
Francesca Burt Jones 110 Brondesbury Road London NW6 6RX	Does not object to the re-development in general, however, concerned that the existing buildings will be replaced by continuous 15 - 20 storey high buildings.	A predominant building height of 4-6 storeys will be required across South Kilburn. A limited number of higher blocks are proposed. This will be significantly less than at present and only in appropriate locations. New high buildings are considered appropriate around the Queens Park station area, at the junction of Cambridge Avenue and Kilburn High Road and at the Albert Road junction with Queens Park station.  Section 4.3.1 Design Guidance for the Urban Quarter (Scale, Height, Massing and Density) identified that the building heights along Albert Road will be staggered with 10-15 storeys near the Queens Park Station, 15-20 storeys within the proximity of the existing Albert	No amendment to the SPD required or the SA to be revisited.

Contact Details	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		Road Day Centre and 6-7 storeys towards Canterbury Terrace. The building form as indicated is indicative and may change.	
	Not only will this dominate the landscape from many angles - including the adjacent Conservation areas of Queens Park and Kilburn - but considering the surroundings does it not seem an inappropriate style of development for the South Kilburn regeneration aims?	<p>The SPD states that Council will expect any proposals to (amongst others) protect the amenity of occupiers, create and protect sufficient sunlight and daylight for buildings and spaces, and protect the historic environment.</p> <p>The density specified in the SPD is in accordance with Policy 4B.3 of the London Plan, UDP Policy H13, TRN6 (Intensive Development at Selected Transport Interchanges) and the Council's SPG17. The proposed density will be comparable to the existing areas surrounding South Kilburn, with an average density of 550 habitable rooms per hectare.</p>	No amendment to the SPD required or the SA to be revisited.
	Serious concerns about doubling the current population living in this area. Increasing the population so drastically and unnaturally would put a great strain on current local facilities such as the tube and train lines and local recreational facilities and schools.	The SPD also requires improved community, leisure, health and education facilities, public open space and public transport improvements	No amendment to the SPD required or the SA to be revisited.
	What about including a leisure centre to include a swimming pool and gym? A new leisure centre would be of great use to both the South Kilburn and adjacent area inhabitants and could help the general health of the local inhabitants including the increasing epidemic of teenage obesity.	A dry indoor sports facility is proposed which does not include a swimming pool. The building, management and maintenance of a public swimming pool is very costly. The Willesden Sports Centre is currently being redeveloped which will include a swimming pool and the Jubilee Sports Centre also has a swimming pool. These facilities are within the proximity of South Kilburn and residents have the ability to visit these pools.	No amendment to the SPD required or the SA to be revisited.

Contact Details	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
Mr P Vickery Flat D 16 Cambridge Gardens Kilburn London NW6 5AY	Cambridge Gardens is a Conservation Area and Residential Area. It is the only green space in this part of South Kilburn. As such it is not suitable for bus stands and it should be a priority to remove the current bus stands and relocate them to a more suitable, non residential place such as along Carlton Vale or the proposed new bus terminus at Queens Park.	Comments noted. Although the SPD seeks improvements to the bus stop arrangements through a legal agreement at Kilburn Park station to address noise and air pollution arising from the current location of buses at Cambridge Avenue and Cambridge Gardens, the relocation of bus stops is the responsibility of Transport for London. Therefore although the SPD can seek improvements it cannot require the relocation of the bus stops. However the Council will endeavour to work with TFL to improve the bus stop arrangements.	No amendment to the SPD required or the SA to be revisited.

## Appendix 1B

### DRAFT SOUTH KILBURN SUPPLEMENTARY PLANNING DOCUMENT ISSUES RAISED THROUGH PUBLIC CONSULTATION (Responses received up to 31<sup>st</sup> March 2005 from specific consultees)

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
<p>London Wildlife Trust Ground Floor Skyline House 200 Union street London SE1OLW</p>	<p>Section 2.2 National and Regional Policy Guidance The following policy documents should be referenced as part of the policy framework, driving the need for a net gain to biodiversity as a sustainability objective of the SPD: PPG17 Planning for Open Space, Sport and Recreation; PPG9 Nature Conservation; PPS9 Biodiversity and Geological conservation and, Regional planning policy in the London Plan. The biodiversity aims of the SPD are also relevant to the aims and objectives of regional biodiversity policy initiatives such as the Mayor's Biodiversity Strategy, London Biodiversity Action Plan, and Brent's Local Biodiversity Action Plan. There is a genuine merit in engaging with the Brent BAP as a critical opportunity for a joined up approach to the boroughs overall sustainable development agenda.</p>	<p>Section 2.2 National and Regional Policy Guidance  Add references to the following policy documents: PPG17 Planning for Open Space, Sport and Recreation; PPG9 Nature Conservation; PPS9 Biodiversity and Geological Conservation; Regional planning policy in the London Plan; And reference to Mayor's Biodiversity Strategy, London Biodiversity Action Plan, and Brent's Local Biodiversity Action Plan</p>	<p>Amendments to the SPD required however no change to the SA is necessary.</p>
	<p>Page 27 Wildlife Corridor It is unclear what the final conclusion or intent is regarding the existing green corridor as part of the Silverlink railway line, policy OS14 and the existing plans for South Kilburn regeneration area, is this to be built on or landscaped in some way. A clearer statement of intent and impact would be helpful.</p>	<p>Section 3.2.5 Wildlife Corridor The Silverlink railway line defined as a wildlife corridor in the UDP does not fall within the defined area of South Kilburn although it does adjoin it. The SPD does not propose any development outside of South Kilburn or within the wildlife corridor. The following amendments are proposed to the SPD to contribute to the value of this wildlife corridor.  Amend to read:  "However, a landscape edge is likely to be required</p>	<p>Minor amendment to the SPD required however this change does not require the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		along the northern boundary of development sites adjacent to the railway line to provide a buffer to attenuate the effects of noise and provide a reasonable level of amenity for future occupants and contribute to the value of the wildlife corridor.”	
	Page 27 Wildlife and Nature Conservation The SPD’s engagement with addressing the identified area of deficiency to accessible wild space in South Kilburn in line with UDP Policy OS17 is of principal importance for achieving a net gain for biodiversity and sustainable development of the area. This can be achieved through a commitment to no net loss of open space and importantly the application of appropriate design, planting and management regimes which are sympathetic to biodiversity. More specific policy reference to the SPD’s contributions to Brent’s BAP would be advisable as part of the promotion of biodiversity’s potential contribution to sustainable development.	Section 3.2.5 Wildlife and Nature Conservation  Add new sentence after the bullet points to read: “ This will contribute towards meeting the objectives of Brent’s Biodiversity Action Plan”.	Minor amendment to the SPD required however this change does not require the SA to be revisited.
	Page 64 Drainage and Surface Water Support is give to the application of green building techniques to the built environment of South Kilburn. Green roofs specifically designed for biodiversity should be used, as opposed to generic green roof systems.	Section 3.3.14 Drainage and Surface Water  Amend the SPD to encourage the provision of green roofs designed for biodiversity, as opposed to generic green roof systems.	The provision of green roofs designed for biodiversity will maximise the benefits to biodiversity in the area. No change to SA is required.
Georgie Cook Planning Administrator Thames Water Property Services Thames Water Clearwater Court Ground Floor East Vastern Road Reading RG18DB	Thames Water support the inclusion of Section 3.3.14 Water and Waste Water. However they recommend that Section 5.2 be amended to require major planning applications to provide a brief assessment of the impact that the proposed planning application will have on utility water and wastewater infrastructure.	Amend Section 5.1 (Approach to Planning Applications) to read .... And infrastructure requirements for each site/phase and (including an assessment of the impacts on utility water and waste water infrastructure).”	Amendments to the SPD required however this change does not require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
David Morrissey London Borough of Camden Town Hall Argyle Street London WC1 H8ND	It is suggested at section 5.2, penultimate bullet point, "Other Impact Assessments" that it should be added that where necessary service providers/public agencies in adjacent boroughs should be consulted to update and add to the previous assessments(and/or at 3.2.2 third paragraph) for added emphasis.	Amend Section 5.2 Other impact assessments to read "... to identify the full impact of the development and necessary mitigation on the area, including the adjoining boroughs (Camden & Westminster)....  Add sentence to Section 3.2.2 Amend 3 <sup>rd</sup> para to read "Any further assessments must include the implications on adjoining boroughs (Camden & Westminster).	Amendments to the SPD required however this change does not require the SA to be revisited.
	At section 3.3.5 in relation to the Transport Assessment it should be stated that the relevant transport sections of adjoining Boroughs should be consulted where relevant in formulating proposals, assessing resultant impacts and identifying mitigation measures.	Amend Section 3.3.5 to read "... and assessment of the proposed mitigation on the area and the adjoining boroughs (Camden & Westminster)."....construction phases of any development "... When preparing the TA the applicant should enter into early discussions with the Council and adjoining boroughs".	Amendments to the SPD required however this change does not require the SA to be revisited.
	At section 3.3.7 it should state that adjoining boroughs should be consulted where relevant on the potential displacement effects of new or extended CPZs arising from the development of proposals.	It is standard practice to consult the adjoining boroughs when new or extended CPZ's are proposed.	No amendment to the SPD required or the SA to be revisited.
	The London Borough of Camden would wish to be consulted on any proposals which are likely to have an impact on Camden particularly tall buildings.	The Council will undertake to consult the London Borough of Camden on any future planning applications which are considered to impact on the adjoining borough.	No amendment to the SPD required or the SA to be revisited.
John Walker Area Team Leader (North) London Borough of Westminster Westminster City Hall 64 Victoria Street London SE1 EQP	Section 1.3 -There is no objection to principle to the regeneration of this area.	Comments noted. No change to the SPD required.	No amendments to the SPD required or the SA to be revisited.



Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	Section 3.2 Land Use and para 3.2.2 - The impact on local school provision needs to be addressed more fully. Please consult the Director of Education in Westminster with your projections for additional school places, in particular any increase in demand for new places in Westminster.	Amend Section 3.2.2 Education, last sentence to read "... confirm the impact on the surrounding schools (within and outside Brent) based upon the number and type of residential units sought."  The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.	Amendments to the SPD required however this change does not require the SA to be revisited
	The protection and enhancement of sports and community facilities is welcomed.	Comments noted. No change to the SPD required.	No amendments to the SPD or the SA to be revisited.
	Section 3.3 - Design Principles - Whilst the general principles appear acceptable, it is not possible to comment in detail until the detailed planning stage is reached.	The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.	No amendments to the SPD required or the SA to be revisited.
	Westminster would like to be consulted on any high/landmark buildings that are visible from Westminster and any proposed development next to our boundaries.	The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.	No amendments to the SPD required or the SA to be revisited.
	We support the requirement of an Urban Design Statement with any outline planning application and would like to see copies of these as and when they are submitted.	The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.	No amendments to the SPD required or the SA to be revisited.
	Section 3.3.3 - The need for exceptional quality in building design is welcome. The context should include Westminster buildings when appropriate -ie by boundaries.	Section 3.3.3 Context amend to read "... the existing or proposed local context (including the adjoining boroughs boundaries , where appropriate)	Amendments to the SPD required however this change does not require the SA to be revisited
	Section 3.3.4 to 3.3.5- The impact on adjacent	Section 3.3.4 Conservation Areas amend to read "...	Amendments to the SPD

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	conservation areas in Westminster needs to be taken into account. The impact of development close to St Augustines Church needs careful consideration.	applied to all development in or adjacent to the Conservation area (including those in adjoining boroughs adjacent to South Kilburn). “... However the following principles should be considered when formulating proposals for development within or adjacent to Conservation Areas (including those in adjoining boroughs adjacent to South Kilburn):”	required however this change does not require the SA to be revisited
	Section 3.3.5 to 3.3.7- section 106 agreements may be required to secure traffic and environmental amelioration works in Westminster depending on the nature of the development, when the details are worked up.	The Council will be obliged to spend any Section 106 payments within the vicinity of the development. This will include adjoining boroughs where appropriate. The adjoining boroughs will be consulted on all future planning applications which are considered to impact on the adjoining borough.	No Amendments to the SPD required nor does this require the SA to be revisited.
	We would like to be see all Traffic Impact Assessments for comment.	The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.	No Amendments to the SPD required nor does this require the SA to be revisited.
	Section 4.2 to 4.4 - Strongly support need for building heights to respect historic height and massing. It is not possible to comment on suggested building heights until details are submitted.  The key view points identified do not seem to have taken into account views from Westminster Streets. Suggest this needs reassessing.	Sections 4.1.1, 4.2.1, 4.4.1 Urban Structure, Form and Circulation add reference to views from adjoining boroughs.	Amendments to the SPD required however this change does not require the SA to be revisited
	Section 5.0 - Westminster would like to receive a copy of all EIA's and TIA's as and when they are submitted.	The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.	No amendments to the SPD or SA required.
	Section 5.2 - All supporting information should include any potential impact	Amend Section 5.2 to read “... The following provides an indication of the supporting documents that will be	Amendments to the SPD required however this

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	on Westminster (where relevant) and not just Brent.	required. These documents should consider any impacts on the area and the adjoining boroughs (Camden and Westminster).	change does not require the SA to be revisited.
	Section 5.6 - Consideration should be given to consulting Westminster residents and Ward Councillors where appropriate, not just residents in Brent. All Consultation Statements should include this requirement.	Amend Section 5.6 to read “,,, and the Council to identify appropriate consultees (including those in adjoining boroughs) and methods of involvement....”	Amendments to the SPD required however this change does not require the SA to be revisited.
Mr Matthew Roe Associate Director CGMS Consulting Morley House 26 Holborn Viaduct London EC1A 2AT ( on behalf of the Metropolitan Police Authority)	The facilities required by the Metropolitan Police Authority to deliver their operational needs within South Kilburn over the forthcoming years are not finalised. However it is likely that additional facilities will be required to ensure the effective policing of the area. No reference is made in the SPD to the provision of police facilities.	One of the SKNDC’s initiatives is to work closely with the Metropolitan Police to create a safer neighbourhood, free from crime and the fear of crime. This includes increasing the police presence in South Kilburn. However it is not intended to provide dedicated police facilities within the area. Therefore no amendments are required to the SPD.	No Amendments to the SPD required nor does this require the SA to be revisited.
	Section 3.2.2 of the SPD should be amended to include “ It is recognised that police facilities throughout South Kilburn are required to create a safe neighbourhood, free from crime and the fear of crime. Accordingly the Council will support innovative solutions and investigate best practices to integrate the police offices into the urban fabric in consultation with the Metropolitan Police Authority. The provision of appropriate police facilities will be sought through a legal agreement”. Associated amendments will also be required to the Implementation Section.	One of the SKNDC’s initiatives is to work closely with the Metropolitan Police to create a safer neighbourhood, free from crime and the fear of crime. This includes increasing the police presence in South Kilburn. However it is not intended to provide dedicated police facilities within the area. Therefore no amendments are required to the SPD.	No Amendments to the SPD required nor does this require the SA to be revisited.
	The Metropolitan Police Authority supports the following: The commitment that mixed use development ensures a feeling of safety (para 3.2); The detailed guidance on providing safe pedestrian and cycle routes (para 3.3.5);	One of the SKNDC’s initiatives is to work closely with the Metropolitan Police to create a safer neighbourhood, free from crime and the fear of crime. This includes increasing the police presence in South Kilburn. However it is not intended to provide dedicated police facilities within the area. Therefore no	No Amendments to the SPD required nor does this require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	Ensuring all development complies with safety and security principles (para 3.3.13)	amendments are required to the SPD.	
Mr Neil Rowley Senior Town Planner Network Rail 2 <sup>nd</sup> Floor The Podium 1 Eversholt Street London NW1 2DN	Network Rail are concerned by the potential resultant effects on Queens Park Station. The ambitious proposals contained within the SPD are likely to increase the use of Queens Park station which would increase the need for capacity improvements. Network rail suggests that the following changes are made to the SPD:  Page 52, text box Accessibility, connectivity and capacity improvements to public transport at Queens Park Station Page 99 Transport Section 106 requirements The provision of public transport accessibility, connectivity and capacity improvements including a bus interchange (facilities and infrastructure) at Queens Park...	The SPD already requires improvements to public transport capacity, infrastructure and facilities, which could include public transport capacity improvements at Queens Park Station.	No Amendments to the SPD required nor does this require the SA to be revisited.
Loren Brown Senior Strategic Planner Greater London Authority City Hall The Queens Walk London SE1 2AA	The overall mix of land uses is considered acceptable. In general terms, the SPD is supported.	Comments noted no change required.	No Amendments to the SPD required nor does this require the SA to be revisited.
	Full support is given to the 100% replacement of existing homes and the 100% replacement of existing affordable housing stock. The commitment to achieving 50% affordable housing on all new housing sites outside the estate boundaries is also supported.	Comments noted. No change to the SPD required.	No Amendments to the SPD required nor does this require the SA to be revisited.
	The tenure mix sought for the affordable housing provision is 70:30, in accordance with the London Plan.	Comments noted. No change to the SPD required.	No Amendments to the SPD required nor does this require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	This dwelling mix is broadly supported. However, the document should include details of the bedroom mix for the various housing tenures. This again should be referenced to the needs of the borough and the immediate area.	The SPD specifies that the Council will require through a legal agreement a mix of sizes across all tenures and on all sites (whether in Council or private ownership), in South Kilburn ranging from one bedroom flats up to four bedroom flats, as indicated in Table 3.1 (Dwelling Mix) of the SPD.	No Amendments to the SPD required nor does this require the SA to be revisited.
	The pepper potting of private and affordable housing is also welcomed, although it is reiterated that this should be carefully considered in management terms.	Comments noted, although this is not a matter for the SPD.	No Amendments to the SPD required nor does this require the SA to be revisited.
	It is pleasing the document includes provision for 100% Lifetime Homes and 10% wheelchair housing in accordance with London Plan policies.	Comments noted. No change required.	No Amendments to the SPD required nor does this require the SA to be revisited.
	The proposed density of habitable rooms per hectare will need to be checked against the appropriate PTAL calculations (awaiting info from TfL).	The densities proposed fit within PPG3, PPG13, the London Plan, UDP Policy and SPG17. Should the density requirements change the applicant would be required to address this as part of any planning application.	No Amendments to the SPD required nor does this require the SA to be revisited.
	It appears that the expectation is that this renewable energy source will provide 10% of the energy needs of the overall site, which is also very welcome. The wording of the relevant paragraph on page 95 of the document can be amended to state this more clearly.	Section 5.2 supplements the requirements specified in the main text and therefore no amendments are proposed.	No Amendments to the SPD required nor does this require the SA to be revisited.
	It may be appropriate to require an investigation of the feasibility of other energy efficient and renewable energy technologies listed in policy 4A.7 of the London Plan.	Amend page 62 to read "Consideration should also be given to the feasibility of other energy efficient and renewable energy technologies identified in Policy 4A.7 of the London Plan.	Amendments to the SPD required however this change does not require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	<p>Additionally, paragraph 5.2 lists the supporting information to be submitted with planning applications, a list that includes the provision of a Sustainability Strategy. This requirement is strongly encouraged. However, contradictorily, section 3.3.14 suggests that such a document will be required by way of a legal agreement. The latter approach of seeking the statement by legal agreement is not acceptable, as the requirement for energy efficiency and renewable technologies needs to be incorporated at an early design stage. Providing such an assessment early in the process is necessary to allow a thorough assessment of the scheme in terms of the London Plan policies and gives plenty of scope for negotiation and explanation. Perhaps section 3.3.14 is attempting to say that a legal agreement will be used to secure the implementation of the previously agreed Sustainability and Environmental Statements? This point should be clarified and amended.</p>	<p>Amend Section 3.3.14 to delete the reference to a Sustainability Strategy being sought through a legal agreement. Amend Section 6.2 to require a legal agreement for measures to implement the Sustainability Strategy.</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>
	<p>Public open space This text could be strengthened with the inclusion of the clear statement that no net loss of open space will be accepted.</p> <p>Of concern however, is that the accompanying figure 3.3 showing the proposed areas of proposed open space does not appear to meet the aspirations of the supporting text. However, it would appear the amount of open space is not substantially increased (in relation to the increase in unit numbers) and several small-unconnected spaces will be created. These spaces should be reconsidered to provide better connectivity.</p>	<p>Section 3.2.5 (The provision of public open space) states that while the Council will not accept the net loss of public open (Policy OS6 Public Open Space), it is recognised that the development of the public open space will be required to facilitate the start of the process.</p> <p>Amendments are proposed to Section 3.2.5 (Public Open Space) para 2 line 1 to read "...a significant increase in the quantity and/or quality of public open space..." and Section 3.3.9 (External Space) by adding an additional sentence to read "... Any loss of existing amenity space is only acceptable where it is either replaced elsewhere or the quality of the remaining amenity space is significantly improved". This is to guarantee that there is no net loss of public open space, but the scheme is not considered viable if</p>	<p>No amendments to the SPD required or the SA to be revisited.</p> <p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>there are significant gains to public open space. Remaining public open space is expected to be of a significantly improved quality to that of existing. It is not viable to expand the quantity of amenity (external) space, and indeed the amendment to page 56 makes it clear that some amenity space maybe lost but this is only acceptable where significant quality of open space will be provided. The requirement for balconies, roof terrace and useable rear gardens will also be a significant compensation for the loss of some existing communal open space.</p>	
	<p>It is proposed that the Granville Public Open Space will be lost in the regeneration process, and it will be built upon to provide two residential blocks of six – seven, and four – five storeys. In principle, this loss of the low quality open space is not opposed, however, any subsequent application should include a strong justification for its loss.</p> <p>Additionally, the proposed open space plan does not appear to provide an area for its reprovision that is of a suitable size and within a proximal location to the existing space.</p> <p>It is felt that the document would benefit from inclusion of these children’s play locations on the illustrative open space plans that are provided.</p>	<p>The SPD set out the justification under which development on Granville Public Open space is accepted. A temporary pocket part will be provided on part of the Granville site and will be available for residents. The pocket park will then be redeveloped in line with the overall public open space framework for South Kilburn.</p> <p>The approach to the provision of public open space and Figure 3.3 (Open Space in South Kilburn) were endorsed as part of the approved Masterplan.</p> <p>The plans and figures within the SPD are used to compliment the text. Section 3.3.11 (Neighbourhood Greens) states that the Council will require the provision of formal play areas for children within each neighbourhood green, to support existing play equipment in South Kilburn Park, community centres and early year’s facilities. Figure 3.3 Open Space in South Kilburn shows the neighbourhood greens as soft public open space, therefore they will contain children’s play areas. It is difficult to show a high level of detail on the Figure at the scale it is drawn at.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p> <p>No amendments to the SPD required or the SA to be revisited.</p> <p>No amendments to the SPD required or the SA to be revisited.</p>
	<p>Waste</p> <p>It is also important that as stated, this strategy must demonstrate the contribution of the development to achieving Government, London and Brent targets and establishes targets for the</p>	<p>Comments noted. Basement provision of waste and recycling facilities will not normally be accepted as the gradients of access ramps prevent materials to be wheeled to collection vehicles. However the SPD does set out the requirements to ensure minimal visual</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	<p>development.</p> <p>The guidance provided within the document about the provision, design and practicalities of the provision of waste and recycling facilities are acceptable. Although, the desire to have no basement provision should be carefully considered, as provision at street level may prove detrimental to visual amenity and, in the instance of the large blocks, be detrimental to the desire to have active street frontages.</p>	<p>intrusion and not adversely affect the amenities of residents.</p>	
	<p>Inclusive design</p> <p>Planning applications are to be supported with an access statement an approach which is welcomed. However, within the main body of the document, there are few references to the need for inclusive design principles to be incorporated into schemes at an early design stage. In particular, an early reference should be made in section 3.3 Design and Development Principles for the Built Environment. Inclusive design principles must to be incorporated into the design of new and the refurbishment of existing buildings, and the design of public open space and the layout of pedestrian routes.</p>	<p>Amend Section 3.3 to read "The Council will expect any application to be accompanied by a number of statements as set out in Section 5.2 (including a perimeter plan, Design Statement ....)".</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>
<p>London Development Agency (As part of the comments from the GLA)</p>	<p>There is an overall objection to the way in which the supporting information to accompany planning applications is sought. Within section 5.2 and in various references throughout the body of the report, there is only the requirement for transport assessments, travel plans access statements, waste management open space frameworks and energy, waste, sustainability, retail and leisure assessments etc for outline planning applications. It is unclear why the requirement for these documents is limited to outline planning applications, as such information may also be necessary to determine full planning applications. This is particularly</p>	<p>To ensure a comprehensive approach the Council is seeking a single outline application followed by reserved matters applications. It is expected that all details that will require supporting assessments will be considered at the outline application stage and not part of the reserved matters applications.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>



Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	important (although not solely) for applications that are strategically referable under the Town and Country (Mayor of London Order) 2000. Further clarity is sought on this matter.		
	The requirement of a comprehensive approach to planning applications as set out in section 5 of the SPD is supported. However, the commercial viability of proposals should also be a consideration and should be included.	A Business Evaluation Model and Business Plan were prepared as part of the Masterplan. Section 5.2 states that these should be updated to identify the full impact of the development and necessary mitigation.	No amendments to the SPD required or the SA to be revisited.
	Section 6.2 of the document sets out the Council's approach to planning obligations which must be coordinated if comprehensive and sustainable development is to be achieved. Pooling of contributions to address the cumulative impact of individual development proposals should be considered, and mechanisms for implementing this (e.g. a community chest) should also be included.	The Council's approach to financial contributions is in line with the Consultation Draft Circular of November 2004.	No amendments to the SPD required or the SA to be revisited.
Transport for London (TfL) (As part of the comments from the GLA)	As a supporting document for proposals, the consultation strategy should make linkages with the emerging Local Development Framework.	Section 5.6 refers to the Council's SCI, Section 7.0 states that the document will be reviewed to ensure there is still a chain of conformity with development plan policy. Section 5.1 also refers to any replacement LDD's.	No amendments to the SPD required or the SA to be revisited.
	A community strategy should be included in the list of supporting information to be submitted with an application (Section 5.2). This should set out how the development's approach the replacement of existing facilities, the provision of new or enhanced facilities and how these will be funded and managed. Also, an economic development and regeneration strategy should be required. This will outline the viability of proposals, its contribution to economic development and regeneration objectives, and its relationship with the needs of the local community (residents and businesses alike). Within the SDP (second to last bullet point of section 5.2) there is leverage for both these	This requirement will be covered in the individual assessments as set out in Section 5.2.	No amendments to the SPD required or the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	<p>strategies to be scoped into any assessment of a scheme.</p> <p>Similarly, this list should include a planning obligations strategy that sets out the amount, type and mechanisms for providing planning obligations, and any relevant pooling mechanisms.</p>		
	<p>TfL generally welcomes the positive references in the document, which relate to the desire to improve public transport, walking and cycling. TfL would welcome further discussion and involvement as regards to the details contained in this document.</p>	<p>Comments noted. No change to the SPD required.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>
	<p>TfL welcomes references in the document that state consultation with TfL and London Buses will be necessary as proposal come forward. This is particularly important in relation to proposals at Premier Corner and Kilburn Park Station, as it is anticipated that close working between the Council and TfL will be necessary to deliver improved transport facilities at these locations.</p>	<p>Comments noted. No change to the SPD required.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>
	<p>Queens Park Station is owned by Silverlink. TfL reiterates that any redevelopment of the station and improvements to the interchange should involve Silverlink, Metronet Rail, Network Rail, London Underground, London Buses and TfL, particularly as the development appears very close to the railway line.</p>	<p>Comments noted. No change to the SPD required. Network rail have commented on the SPD, (see comments above). Silverlink, Metronet Rail, Network Rail, London Underground, London Buses and TfL were all consulted on the SPD.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>
	<p>Any related Transport Assessments should calculate the number of public transport trips for buses, Underground and trains.</p>	<p>Section 5.2 states that the required Transport Assessment must include an estimate of trip generation and distribution for all transport modes resulting from the development.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>
	<p>Cycle parking should conform to the standards</p>	<p>UDP Appendix TRN2:Standard PS16 Cycle Parking Standards complies with the requirements of the</p>	<p>No amendments to the SPD required or the SA to be</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	of the London Cycle Network Design Manual.	London Cycle Network Design Manual.	revisited.
	On page 49, traffic calming is to be employed on all existing and proposed local access roads. Some local access roads may allow buses to use these streets. It is important that any traffic calming measures do not adversely affect buses.	The traffic calming measures along Carlton Vale are unlikely to affect buses. Other traffic calming measures proposed are unlikely to be on roads used by bus routes.	No amendments to the SPD required or the SA to be revisited.
Graham Saunders Planner/Urban Design English Heritage London Region 23 Saville Row London W1S2ET	Amend the Archaeology section of the SPD to ensure consultation is undertaken with GLASS and English Heritage.	Amend the Archaeology section to read: "The potential for archaeological survival can be established through the Greater London Sites and Monuments Record held by English Heritage, and through consultation with the Greater London Archaeology Advisory Service (GLAAS), also at English Heritage, who act as the Council's archaeological advisors.	Amendments to the SPD required however this change does not require the SA to be revisited.
	Provide further detail as to the historical context of Kilburn High Road in relation to possible archaeological remains	There is a potential for archaeological remains within South Kilburn due to the close proximity to Kilburn High Road, which follows the route of the Roman Watling Street. The High Road remained a major thoroughfare in the medieval period, with manors, religious houses and other settlement activity in the vicinity of the Kilburn High Road London Underground station.  In accordance with Policy BE31 (Sites of Archaeological Interest), where development may affect land of archaeological importance, the Council will require a phased approach to archaeological assessment and analysis leading to the dissemination of the results:	Amendments to the SPD required however this change does not require the SA to be revisited.
	Correctly refer to the Stage 1 Desktop Archival Analysis	Amend to read "Stage 1 Desktop Assessment"	Amendments to the SPD required however this change does not require the SA to be revisited.
	Stage 2 Site Preliminary Evaluations Amend to indicate there may be potential for archaeological remains to be present on the site and clarify the requirements for any preliminary evaluations.	Amend to read "If the preliminary assessment of primary and secondary sources indicates the potential for archaeological remains to be present on the site, the Council will require an initial archaeological site investigation of the site to inform the ongoing	Amendments to the SPD required however this change does not require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		development of the scheme. This may take the form of trial trenching or monitoring geotechnical work. This investigation may be required prior to the determination of any planning application submitted for the site. The results of the initial site evaluation will inform as to the need for further mitigation, either in the form of excavation or preservation in situ. Therefore the Council will require that all proposed schemes consider archaeological implications very early in the project.”	
	Insert requirements for Stage 3 and Stage 4 of the archaeological assessment process.	<p>Stage 3 Archaeological Mitigation</p> <p>Should the preliminary site investigation demonstrate that significant archaeological remains are present on the site, the Council will require further archaeological work as mitigation. This may include areas of excavation, preservation in situ, or an archaeological watching brief during construction. All archaeological assessment should be carried out by a recognised contractor in accordance with the regulations and codes of practice of the Institute of Field Archaeologists and the GLAAS Guidance Papers.</p> <p>Stage 4 Dissemination of Results</p> <p>The Council will expect that the results of all archaeological work will be subject to a programme of reporting, analysis, publication and archiving, so that the results of the work are made available for further academic study and to the wider community. The Council considers that involving the public in the archaeology and history of their local areas has educational and leisure benefits, as well as affording a sense of place. Accordingly, schemes that afford access to archaeological sites or other forms of public engagement are to be encouraged.</p>	Amendments to the SPD required however this change does not require the SA to be revisited.
	Amend text box to refer to the correct steps for archaeological assessment, analysis and public dissemination.	Amend Text Box to read “Require an archaeological assessment of sites and where development may affect land of archaeological importance, the Council will require a phased approach to archaeological assessment, analysis and public dissemination.”	Amendments to the SPD required however this change does not require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
	<p>Section 3.3.4 Conservation Areas, Listed Buildings and Archaeology</p> <p>Refer to the historic environment and state that in the historic quarter the listed buildings and conservation area will have a significant impact on design guidance for this quarter.</p>	<p>Amend to read "These elements of the historic environment are valued not only by the Council but by the people of South Kilburn. Figure 3.7 illustrates the extent of the South Kilburn Conservation Area and the location of both statutory and local listed buildings within South Kilburn.</p> <p>Appendix 3 provides a list of statutory and locally listed buildings, and properties within the Conservation Area. The Conservation Area covers properties between Chichester Road / Cambridge Avenue and Princess Road / Oxford Road and selected adjacent areas. It is part of the Kilburn Park estate of stucco and stock brick villas dating from 1861-1873. Many of the buildings display ornate architectural designs of Italianate origin, and most of them are listed. Indeed the majority of the listed buildings and the Conservation Area are located within South Kilburn's historic quarter and therefore will have a significant impact upon the development of design guidance for this specific character area. Specific design considerations are provided in Section 4 (Neighbourhood design principles) of this SPD.</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>
	<p>Section 3.3.4 Conservation Areas</p> <p>Amend to refer to protect and enhance the areas heritage and the principles which should be considered when formulating proposals within or adjacent to the Conservation Area.</p>	<p>The Council will strongly resist the loss or alteration of buildings and open spaces within the Conservation Area if it will adversely affect the special character and appearance of the area. The Conservation Area should be seen as an opportunity to understand, protect and enhance the areas heritage in order to deliver a sensitive and high quality design solution for the rehabilitation of South Kilburn. To this end the Council requires that PPG15 must be applied to all development in or adjacent to the Conservation Area, namely;</p> <p>However the following principles should be considered when formulating proposals for development within or adjacent to South Kilburn Conservation Area and any other neighbouring conservation areas affected:</p> <ul style="list-style-type: none"> <li>• Development must, if it is to adhere to the general high standards of development within</li> </ul>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>the SKNDC by inference enhance the character and appearance of the Conservation Area.</p> <ul style="list-style-type: none"> <li>• Any proposals for change must respect the scale, massing and composition of both the building affected and any neighbouring buildings and spaces.</li> <li>• The existing historic pattern of streets and spaces and the established rhythm of the buildings both vertically and horizontally must be respected.</li> <li>• The existing historic urban form and structure must be understood, respected and incorporated where appropriate into any proposals. Key features such as forecourts, front to back access, and entrances to individual residences within blocks should be considered.</li> <li>• The rhythm of doors and fenestration and their contribution to the character and appearance of the area should be respected and reflected in any proposals for change.</li> <li>• The quality of all new architecture must reflect the quality of existing buildings and spaces, including the individual elements of building design that are outlined in the section on architectural quality above.</li> </ul>	
	<p>Section 3.3.4 Statutory and Locally Listed Buildings</p> <p>Amend text to correct grammatical errors and terminology.</p>	<p>Amend to read “There are a number of historically important and architecturally significant Listed Buildings in South Kilburn. These buildings can provide significant clues to the formulation of successful solutions to high quality development within a dense urban residential environment. The high quality design of these buildings should be reflected in all redevelopment within South Kilburn. Listed Buildings are generally robust if maintained in continuous use</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>but their setting and role within the urban environment can be significantly diminished if development is not sensitive to the needs of these buildings.</p> <p>The Council will strongly resist the loss of buildings on the statutory list and will not permit development that would adversely affect the setting of a Listed Building, pursuant to Planning Policy Guidance 15 (Planning and the Historic Environment) and Policy BE22 (Protection of Statutory Listed Buildings) and Policy BE23 (Setting of Listed Buildings) of the UDP.</p> <p>All work to a Listed Building or affecting its setting, must be considered against the advice detailed in PPG 15. The advice given is tried and tested and if followed should lead to a successful scheme. However, the Council understands the special circumstances of the regeneration of South Kilburn, and will require careful consideration of the following principles when dealing with statutory and locally Listed Buildings:</p> <p>Work to a Listed Building:</p> <ul style="list-style-type: none"> <li>• It is envisaged that only persons experienced in historic building work will formulate any proposals for Listed Buildings.</li> <li>• Any Proposals must consider the essential character of the Listed Building and proposals for alteration and or extension must reflect and build upon that character and follow through the high quality of material, detail and design.</li> <li>• Only appropriate historic materials will be acceptable for repair and alteration of Listed Buildings.</li> </ul> <p>Works affecting the “setting” of a Listed Building:</p> <ul style="list-style-type: none"> <li>• Any Development adjacent to a Listed Building must, if it is to adhere to the general high standards of development within the SKNDC, by inference add to and improve upon the</li> </ul>	

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>positive contribution to the character of the historic building.</p> <ul style="list-style-type: none"> <li>• The scale, form and massing of proposals adjacent to a Listed Building must be respectful of the scale, form and massing of that building. Any proposals for change shall demonstrate how that change is to be achieved in a sensitive architectural manner that mitigates the impact of the proposal upon the Listed Building.</li> <li>• Schemes must consider whether they are to replicate the historic style quality and detail, or are to propose a respectful contemporary building that complements the historic precedent.</li> <li>• The contribution of the Listed Building to the historic urban form and structure must be respected and developed. The vertical and horizontal rhythms of the listed building must be responded to.</li> <li>• The quality of the architecture must reflect the quality of the Listed Buildings and the individual elements of building design that are outlined in the section of architectural quality should be applied</li> <li>• The choice and mix of materials will be very important in maintaining the historic character of the area. Proposals should demonstrate how the choice of materials coordinates and or complements Listed Buildings in close proximity.</li> </ul> <p>Development affecting statutory Listed Buildings or development within the Conservation Area will require listed building consent, conservation area consent, and/or planning permission. St Augustine's Church on Kilburn Park Road is a Grade I Listed Building.</p>	



Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>Although it is located beyond the boundary of South Kilburn, the setting of the church and in particular any development affecting the views of the church, will be an important consideration in the redevelopment of South Kilburn.</p> <p>The Council will require a Heritage Statement to be submitted as part of any planning application addressing the impacts of development proposals on the character and appearance of South Kilburn Conservation Area, and its setting; and for any proposals to a Listed Building and its setting from any surrounding development.</p>	
	Section 4.1.1 Design guidance for the Historic Quarter - Urban Structure, Form and Circulation	<ul style="list-style-type: none"> <li>• That building footprints are arranged to respect the urban form and grain; and that entrances into this historic network are located and positioned to reinforce the historic character.</li> <li>• Perimeter blocks to be designed to reinforce the existing street patterns and spaces, re-establishing and interpreting the relationship of building footprint to road and pavement (see plan “Urban Figure”).</li> </ul>	Amendments to the SPD required however this change does not require the SA to be revisited.
	Scale, Massing and Density Refer to Listed Buildings using initial capitals	Amend to read: Building heights should respect the historic precedents within the neighbourhood. Where possible development in close proximity should be of a similar vertical scale and make changes in building height slowly and subtly, in line with the guidance described within the section on Listed Buildings and Conservation Areas.	Amendments to the SPD required however this change does not require the SA to be revisited.
	The Public Realm Insert additional bullet point to require an assessment of existing street furniture before new provision is made to avoid clutter	Amend: New street furniture should be only considered after an assessment of the existing provision has been made in order to avoid excessive clutter within the streetscape.	Amendments to the SPD required however this change does not require the SA to be revisited.
	Section 4.1.2 Private Sites The Canterbury Works Site Add reference to buildings and spaces within the neighbouring Conservation Area.	Amend bullet point to read: “the form, scale and massing of surrounding residential particularly Carlton House, west of the site and buildings and spaces found within the neighbouring South Kilburn Conservation Area.”	Amendments to the SPD required however this change does not require the SA to be revisited.

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>The nature and design of any new buildings, particularly new homes, and external spaces will be subject to the general guidance contained in section 3 and should enhance the character and appearance of the neighbouring South Kilburn Conservation Area.</p> <p>Any applications must be accompanied by relevant assessments concerning railway noise and vibration, contaminated land (and the need for remediation), residential amenity (including sunlight and daylight with respect to individual units and external spaces), and impact upon the character and appearance of South Kilburn Conservation Area.</p>	
	<p>Section 4.1.2 Private Sites Add references to the adjoining Conservation Areas and those buildings within the Conservation Area.</p>	<p>The Prince of Wales Public House (private site 21) and The Duke (of Cambridge) Public House (private site 30) are Listed Buildings. The Prince of Wales is a Grade II Listed Building, (sited within South Kilburn Conservation Area) and The Duke is locally listed (sited close to South Kilburn Conservation Area). The Council will not accept the loss of either building (Policy BE22 and BE24). Both buildings are considered appropriate for residential, or a mixed use development containing residential, subject to an acceptable design that respects their historic value. The Tin Church (private site 18) is also a Grade II Listed Building(sited within South Kilburn Conservation Area) and therefore demolition is not acceptable. There is the potential to extend the church for community use but this must be compatible with its design and setting. The church provides a community facility and its use must be retained (Policy CF3 Protection of Community Facilities).</p> <p>Two sites currently provide commercial uses. Local shops along 41 - 63 Kilburn High Road (private site 17), sited within South Kilburn Conservation Area, are located within the secondary shopping frontage of the Kilburn Road major town centre. Town centre uses</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>must be retained on the ground floor (Policy SH9 Secondary Shopping Frontages) but residential is considered acceptable on upper storeys. 1a-3 Cambridge Avenue (private site 16), adjoining South Kilburn Conservation Area is currently occupied by Job Centre Plus and local shops. The town centre uses on this site must also be retained.</p> <p>Three community facilities are located on private sites: the Salvation Army Goodwill Centre (private site 22), a doctors surgery at 12 Cambridge Avenue (private site 20) and the Iranian Embassy School on Carlton Vale (private site 29). These sites must be retained for community facilities (Policy CF3 Protection of Community Facilities) unless otherwise stated. The Council will accept the relocation of the doctor's surgery within South Kilburn and redevelopment of the site for residential uses, provided the relocation of the surgery and redevelopment of the site is consistent with UDP policy and SPG guidance. The Council would also accept the introduction of residential uses on the Salvation Army site and/ or relocation of the community facility elsewhere in South Kilburn. Any redevelopment of the Salvation Army site must be designed to complement the proposed redevelopment to the rear of the site. A strip of land along the northern boundary of the Iranian Embassy School site is required to achieve the Masterplan proposals (to reconnect Granville Road) but the remainder of the site could support an extension or redevelopment of current education uses. Any physical redevelopment of these sites must take into account their location within South Kilburn Conservation Area (Salvation Army and doctor's surgery sites) and area of low town townscape or public realm quality (Iranian Embassy School) as designated in the UDP.</p> <p>The St Mungo Community Association site (private site 23) provides hostel accommodation for homeless people. The Council will not permit a change of use, pursuant to Policy H27 (Hostel Accommodation),</p>	

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		<p>unless the applicant can demonstrate that the need can be met elsewhere. Any proposals for change must take account of the sites proximity to South Kilburn Conservation Area.</p> <p>The Sunken Tennis Courts, St Augustine's School on Rudolph Street (private site 31) are disused. The site must be retained as public open space for sports use (Policy OS8 Protection of Sports Grounds). The boundary of the site can be amended to enable surrounding development, provided the net area of open space is not reduced (as illustrated in this SPD and Masterplan) and the character and appearance of South Kilburn Conservation Area is not compromised.</p>	
	<p>5.2 Planning Applications: Supporting Information</p> <p>Ensure the Heritage Statement refers to the character and appearance of the conservation area, its setting and any proposals to a listed building.</p>	<p>Amend to read: A Heritage Statement is required to address the impacts of development proposals on the character and appearance of South Kilburn Conservation Area and its setting; and any proposals to a Listed Building and its setting from any surrounding development. Proposals to redevelop Listed Buildings or buildings within the conservation area will require listed building consent and/or conservation area consent, dependant upon the nature of the proposed works (more details are provided below).</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>
	<p>Section 5.3 Listed Buildings and Conservation Area Consents</p> <p>Refer to PPG 16 and correct grammatical error.</p>	<p>Applicants will need to demonstrate whether and to what extent the proposal contributes to preserving or enhancing the character and appearance of the conservation area. The redevelopment envisaged does not propose changes within the Conservation Area.</p> <p>In assessing these applications, particular consideration will be given to the appropriateness of the proposal in terms of its location and quality of design. Applicants should refer to full details provided in PPG 15 (particularly paragraphs 3.16-19) and PPG 16. The Council will require the impacts of</p>	<p>Amendments to the SPD required however this change does not require the SA to be revisited.</p>

Organisation	Comment	Officer response to comment	Are amendments needed to the SPD? Does the SA need to be revisited as a result?
		development on the Conservation Area and/or listed Buildings to be addressed in a Heritage Statement accompanying any planning application.	
<p>Tony Benton Education Department 13th Floor Westminster City Hall 64 Victoria Street London SW1E 6QP</p>	<p>The proposed SPD for South Kilburn has a potential impact on school places in Westminster with St Augustine's Primary &amp; Secondary Schools located on the Westminster/Brent border.</p> <p>Would you please include Westminster's Education department in any further consultation that you may undertake.</p>	<p>An Education Impact Assessment was undertaken as part of the Masterplan and assumed a worst case scenario. This assessment assessed the additional school places that may be required and included schools in the surrounding boroughs. The assessment also considered proposals to extend existing schools and the opportunity to redevelop South Kilburn schools. The developer would be required to update the Education Impact Assessment and identify the full impact of the development and any necessary mitigation.</p> <p>The Council will undertake to consult the London Borough of Westminster on any future planning applications which are considered to impact on the adjoining borough and provide information on the relevant supporting information.</p>	<p>No amendments to the SPD required or the SA to be revisited.</p>

OFFICER AMENDMENTS TO THE  
DRAFT SOUTH KILBURN SUPPLEMENTARY PLANNING DOCUMENT

(as at 31<sup>st</sup> March 2005)

Issue	Relevant Section/s of the SPD	Proposed Change to the SPD
Incorrect referencing to the Homes Section	Page 74 Section 4.1.2 (Private Sites) 2 <sup>nd</sup> para Page 81 Section 4.2.2 (Private Sites) 1 <sup>st</sup> para Page 91 Section 4.4.2 (Private Sites) 3 <sup>rd</sup> para	Amend section references from Section 3.1.1 (Homes) to read Section 3.2.1 (Homes)
Incorrect referencing to the Architectural Quality Section	Page 72 Architectural Quality 1st bullet point  Page 79 Architectural Quality 1 <sup>st</sup> bullet point Page 85 Architectural Quality 1 <sup>st</sup> bullet point Page 89 Architectural Quality 1 <sup>st</sup> bullet point	Amend section reference from section (3.2.3) Architectural quality to read Section 3.3.3 (Architectural quality) Amend to read Section 3.3.3 Amend to read Section 3.3.3 Amend to read Section 3.3.3
Inconsistent numbering of private sites within Section 4	Sections 4.1.2, 4.2.2, 4.3.2, 4.4.2	Amend numbering of private sites in Sections 4.1.2, 4.2.2, 4.3.2, 4.4.2 to reflect the numbering on Figure 4.2 Private Sites
Remove references to acceptable land uses	Page 74 Section 4.1.2 Private Sites para 7	Delete the following text “ (residential units, including affordable housing, community facilities and work-live units).
Clarify the building form of surrounding residential units	Page 75 Section 4.1.2 Private Sites 1 <sup>st</sup> bullet point	Amend to read “...surrounding residential blocks particularly..”
Clarify the appropriate uses for the sites	Page 75 Section 4.1.2 Other Sites 1 <sup>st</sup> para	Amend to read “ The Council will not accept the loss of either building... However the Council would consider a change of use”.
Refer to the correct name of the Tin Church and appropriate uses for the site	Page 75 Section 4.1.2 Other Sites 1 <sup>st</sup> para	Amend to read “The Cambridge Hall (Tin Church)”...There is the limited potential....”
Refer to the correct address for private site 15	Page 75 Section 4.1.2 Other Sites 2 <sup>nd</sup> para	Amend to read “1a-3 Coventry Close”
Refer to the use of the site referred to in Figure 4.2 Private Sites	Page 75 Section 4.1.2 Other Sites 3rd para	Amend to read “The mini coach hire site”
Remove references to potential of the site	Page 75 Section 4.1.2 Other Sites 3rd para	Delete last sentence
Refer to the correct name of the Iranian Embassy School	Page 75 Section 4.1.2 Other Sites 4th para Page 76 Section 4.1.2 Other sites 1 <sup>st</sup> sentence	Amend to refer to “Islamic Republic of Iran School”
Correctly refer to SPD guidance	Page 75 Section 4.1.2 Other Sites 4th para	Amend to read “ consistent with UDP policy and SPD guidance”
Remove references to the acceptable uses of the site	Page 75 Section 4.1.2 Other Sites 4th para	Delete sentences “The Council would also accept the introduction of .....” and “Any redevelopment of the Salvation Army....”
Remove references to the Salvation Army	Page 75 Section 4.1.2 Other Sites 4th para last	Amend last sentence to read “ .... Must take into account

Issue	Relevant Section/s of the SPD	Proposed Change to the SPD
and doctor's surgery sites	sentence	their location with the conservation area and area of low townscape or public realm..."
Refer to the correct use of the site	Page 76 Section 4.1.2 Other Sites 1 <sup>st</sup> para	Amend to read " The St Mungo Community Association site ... provides hostel accommodation"
Clarify the location and refer to the correct address of the Sunken Tennis Courts	Page 76 Section 4.1.2 Other Sites 2nd para	Amend to read " The Sunken Tennis Courts on Cambridge Road are part of St Augustine's School. These tennis courts are disused."
Clarify the circumstances when Council will accept non retail uses	Page 81 Section 4.2.2 Other sites 1 <sup>st</sup> para	Amend to read "...the Council will not accept more than 35% of shop units in non retail use, unless vacancy rates are 10% or more ,when the Council may ...."
Clarify the appropriate use of the site	Page 81 Section 4.2.2 Other sites 2 <sup>nd</sup> para	Amend to read " ...is included on the local list and therefore demolition will be resisted... and any redevelopment should retain and enhance this building.... Given its residential surrounds, the Council considers residential use...."
Refer to the correct name of the site	Page 81 Section 4.2.2 Other sites 2 <sup>nd</sup> para	Amend to refer to "Park Business Centre"
Delete references to the proposed uses and up date to provide greater detail following pre application discussions	Page 86 Section 4.3.2 Private Sites 4 <sup>th</sup> Para	Amend to read " ..Redevelopment of this site must be designed to face the new neighbourhood squares and Carlton Vale.."
Clarify the appropriate uses for the site and requirements for redevelopment of the site	Page 86 Section 4.3.2 Other Sites 1st Para	Amend to read "The Council will allow the loss of .....for residential uses," "....The redevelopment for residential is appropriate given that..." "Any redevelopment of this site must address the poor townscape, quality of the public realm, and respect proposals for redevelopment of surrounding sites as proposed in this SPD"
Clarify the redevelopment of sites within the and appropriate uses within the Queens Park Planning Area Brief	Page 86 Section 4.3.2 Other Sites 2nd Para	Amend to read " ... sites within the Queens Park Planning Area Brief (private site 11).....The Council supports the redevelopment of the sites within this area for a mix of uses including retail, A3, office use, community and residential uses, as set out in the QPSA Brief.... This is consistent with the objective of the Queens Park Station Area Brief to link Salusbury Road to the north of the railway and the area to the south. However the redevelopment of the British Legion and Albert Road Day Centre would only be appropriate if the community uses were re provided elsewhere within South Kilburn"
Clarify the redevelopment of the OK club	Page 86 Section 4.3.2 Other Sites 3rd Para	Delete last sentence and amend to read "A redevelopment of the OK Club site may be reconsidered subject to the re provision of the community use. The appropriate additional use would be residential, however any redevelopment needs to consider proposals for the wider area as set out in this SPD"
Clarify the sites within the local centre along Kilburn Lane	Page 91 Section 4.4.2 Private Sites 2 <sup>nd</sup> Para	Amend to read 273-307 Kilburn Lane
Clarify the existing use of the site and	Page 91 Section 4.4.2 Private Sites 3rd Para	Amend to read "1 Banister Road is currently a partially

Issue	Relevant Section/s of the SPD	Proposed Change to the SPD
specify appropriate uses		vacant site. Any redevelopment should include....”
Spelling error	Section 5.2 Planning Applications: Supporting Information, Waste Management Strategy	Amend to read “...details on the design of waste and recycling storage, and collection facilities...”
Clarify the limitations	Section 3.3.3 Architectural Quality 2 <sup>nd</sup> sentence	Proposals will not be accepted that excuse lack of quality through financial or contractual limitation.
Add an additional word	Section 3.3.8 New Residential Buildings and Mixed Use Schemes, 3 <sup>rd</sup> sentence	Amend to read “...Consideration will need to be given to the ...”



Appendix 3

**Sustainability Appraisal of the South Kilburn Supplementary Planning Document  
Issues raised through public consultation  
(as at 31<sup>st</sup> March 2005)**

Organisation/Individual	Comment	Officer response to comment	Are amendments needed to the SA? Are any subsequent changes required to the SPD as a result?
<p>Councillor Reg Freeson Room 216 Brent Town Hall Forty Lane Wembley, HA9 9HD</p>	<p>Appendix 7 Land Use Principles -Objective 3 - Education &amp; Skills - Recommended 'no change' is incorrect Section 106 contributions towards school places beyond present schools' capacity won't meet need for site assembly for expansion. Kilburn Park Junior, Carlton Infants and nearby Salusbury schools' sites already substandard. Expansion will exacerbate this. Also preschool, child and family centres and extended school policies need SPD cover.</p>	<p>An Education Impact Assessment was undertaken as part of the Masterplan and assumed a worst case scenario. This assessment assessed the additional school places that may be required and included schools in the surrounding boroughs. The assessment also considered proposals to extend existing schools and the opportunity to redevelop South Kilburn schools. The developer would be required to update the Education Impact Assessment and identify the full impact of the development and any necessary mitigation.</p>	<p>A minor amendment has been made to the SPD to state that the Council will work with the DFEE to secure appropriate resources to assemble sites and develop suitable school provision.</p> <p>However this amendment to the SPD does not require the SA to be revisited.</p>
	<p>Appendix 7 Land Use Principles -Objective 8 - Access to key services - SPD section 3 should cover improving access at Queen's Park Station (and Brondesbury Park, Kensal Rise and Green stations) in particular, need for escalators and/or lifts to be installed for access by wheelchair and others with disabilities, elderly people and parents with prams.</p>	<p>The redevelopment of Brondesbury Park, Kensal Rise and Kensal Green stations are outside the defined area of South Kilburn and the extent of the SPD. Any redevelopment of these stations is dependant on Rail authority funding priorities. The approved Queens Park Station Area Brief provides further guidance on the redevelopment of the station. The redevelopment of the station itself is dependant on Rail Authority funding priorities. It is agreed that the future redevelopment of these stations should include step free access.</p>	<p>The Queens Park Station area planning brief includes the redevelopment of the Queens Park station and is incorporated into the SK SPD. The Queens Park Station area brief provides further guidance on the redevelopment of the station. The redevelopment of the station itself is dependant on Rail Authority funding priorities.</p> <p>No amendments are required to the SPD or the SA.</p>
	<p>Appendix 7 Land Use Principles - Objective 3 - Improve education and Skills Add: ensure use of sports, gymnasias and community facilities in feeder secondary schools.</p>	<p>There are no secondary schools within the South Kilburn SPD area.</p>	<p>No amendments required to the SA or the SPD.</p>

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	Appendix 7 Design and Development Principles - Objective 15 - Climate Change Is ensuring efficient practices beyond SPD scope. Why not make this a condition of development approval, as is the case with other managerial matters.	Section 3.3.14 of the SPD provides detailed guidance on the requirements for Sustainable Development including energy efficiency and renewable energy. However, the SPD will be amended following comments from the GLA and Councillor Freeson to state that consideration should be given to the feasibility of other energy efficient and renewable energy technologies.	A minor amendment has been made to the SPD as specified.  However this amendment to the SPD does not require the SA to be revisited.
	Appendix 7 Objective 5 – Paddington Recreation Ground, do not agree with ‘no change’ because there are existing entrances. The closest entrance is near Carlton Vale Draft SPD listed changes will not benefit South Kilburn residents much if at all. Easy and visually enhancing residents’ access from nearby housing and footways achievable by planning to clear one or two Kilburn Park Road RSL owned properties	Although it maybe desirable to provide an additional access to Paddington Recreation Ground this would require CPO’ing properties within the London Borough of Westminster. This falls outside the defined South Kilburn SPD area.	No amendments required to the SA or the SPD.
	Appendix 7 Design and Development Objective 1 Principles Energy efficient building – Why just “encourage” and why just “one building to be an exemplar?” Too limited an aim.	A balance of social, economic and environmental improvements are sought within the SPD for South Kilburn. Experience from the Show Homes and Granville New Homes has proven that it is difficult to achieve excellent standards and all the other planning priorities for the area. The SPD requires all non residential developments to achieve a BREEAM rating of very good and encourages the provision of one non residential development to meet the excellent BREEAM rating. It also states that at least one residential building to serve as an exemplar for sustainable residential design and energy efficiency. This does not preclude additional exemplar developments to be provided.	No amendments required to the SA or the SPD.
Loren Brown Senior Strategic Planner Greater London Authority City Hall The Queens Walk	The methodology and approach outlined within the document appears satisfactory.	Comments noted. No change required.	No amendments required to the SA or the SPD.

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London SE1 2AA			
Graham Saunders Planner/Urban Design English Heritage London Region 23 Saville Row London W1S2ET	Under 'Appendix 1: Sustainability Objectives and Criteria', the criteria for objective 14 could be amended to the following;  'Will it protect <u>and enhance</u> the listed building <u>and its setting</u> ?'	Appendix 1 Sustainability Objectives and Criteria – Objective 14, Criteria 2. Delete "Will it protect listed buildings?" replace with "Will it protect and enhance the listed building and its setting?"	Minor amendments required to the SA for accuracy, however this does not require the SA to be revisited or the SPD to be amended. The extent of these amendments are specified on the errata sheet to the SA.
	Under 'Appendix 5: Baseline Data' within the 'Townscape and Historic Environment' category the following 'theme/indicators' could be used to help monitor change the conservation area and design quality of planning application submissions.  <ul style="list-style-type: none"> <li>• Total area (ha) and number of Conservation Areas</li> <li>• Percentage of Conservation Areas with an up to date adopted Appraisal/Audit</li> <li>• Number and percentage of all planning &amp; listed building applications received with an appropriate detailed Design/Heritage Statement submitted.</li> </ul>	These 'theme/indicators would be appropriate on a borough wide basis however this Sustainability Appraisal only relates to the South Kilburn SPD. A small part of South Kilburn is covered by one Conservation Area. It is unlikely that any more would be proposed within South Kilburn are the existing Conservation area to be changed. The Council has a work programme scheduling the Conservation Area appraisals which it will undertake over the next two years which includes the South Kilburn Conservation Area. All future planning applications with South Kilburn will be required to submit an urban design statement and may also require a Heritage Statement. These matters will also be considered as part of the Annual Monitoring Report.	No amendments required to the SA or the SPD.
	As with the Consultation Statement, 'Appendix 7:changes to the SPD as a result of the SA process' does not contain objective 14 'to conserve and where appropriate enhance the historic environment and cultural assets'. Is this an omission or can I assume that there has been no amendments to the draft SPD which relate to this objective?	Comments noted. This was an omission. Extensive amendments to the Consultation Draft SPD are proposed as a result of comments from English Heritage which will ensure that the historic environment and cultural assets within South Kilburn are conserved and where appropriate enhanced.	Minor amendments required to the SA for accuracy, however this does not require the SA to be revisited or the SPD to be amended. The extent of these amendments are specified on the errata sheet to the SA.

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	<p>Under 'Appendix 8: Matrices for appraisal of development principles' I would suggest that under objective 7 'to encourage a sense of local community; identity and welfare', improvements in historic assets will provide a greater sense of community pride and reinforce local identity. Whilst under the economic objectives, I would suggest that the enhancement of areas heritage would lead to significant economic benefits and improved image which would be attractive to inward investment.</p>	<p>Appendix 8, Objective 7 – add an additional criteria “Will it improve the historic assets?” Score +, Effect - provide a greater sense of community pride and reinforce local identity</p> <p>Appendix 8 Economic objectives - Insert additional objective “To enhance areas of heritage”. Criteria – Will it enhance areas of heritage? Score + Effect – Contribute towards improved image of the area making it more attractive to inward investment.</p>	<p>Minor amendments required to the SA for accuracy, however this does not require the SA to be revisited or the SPD to be amended. The extent of these amendments are specified on the errata sheet to the SA.</p>